



ADMINISTRATION FOR
CHILDREN & FAMILIES
 Office of Community Services

Community Services Block Grant (CSBG) State Plan

CSBG Cover Page (SF-424M)

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THE PAPERWORK REDUCTION ACT OF 1995 (Pub. L. 104-13): Through this information collection, ACF is gathering information about planned activities related to and funded by CSBG for the upcoming fiscal year. Public reporting burden for this collection of information is estimated to average 31 hours per grantee, including the time for reviewing instructions, gathering and maintaining the data needed, and reviewing the collection of information. This is a mandatory collection of information (Sec. 676, Pub. L. 105-285, 112 Stat. 2735 (42 U.S.C. § 9908)). An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information subject to the requirements of the Paperwork Reduction Act of 1995, unless it displays a currently valid OMB control number. The OMB # is 0970-0382 and the expiration date is 08/31/2024. If you have any comments on this collection of information, please contact M. Monique Alcantara at melania.alcantara@acf.hhs.gov.

Instructions

The CSBG State Plan is currently under review through the Office of Management and Budget (OMB) clearance per the requirements of the Paperwork Reduction Act of 1995. OCS created this fillable form as a tool for CSBG grantees as they plan for the administration of CSBG for Fiscal Year (FY) 2022. CSBG grantees can use this tool for planning purposes including, but not limited to: consultation with stakeholders, and meeting public and legislative hearing requirements (Section 676(a)(2)(B) and Section 676(a)(3) of the CSBG Act).

Once the CSBG State Plan receives clearance through OMB and the CSBG State Plan is available through GrantSolutions.gov, CSBG grantees may copy and paste their answers into the online form.

This form allows for the following types of responses:

☐ **Checkbox** – Select the box to choose an option.

Choose an item. **Dropdowns** – Select the box, and then click the down arrow that appears to select an available option.

Click or tap to enter a date. **Date Picker:** Select the box, and then click the down arrow that appears to select an available option.

Click or tap here to enter text. **Narrative Text Field (No Characters Limit).** Click the box to start entering text.

Narrative Text Field (Character Limit). Start typing within the gray square to enter text. These fields only allow for a certain character limit as described in the [blue](#) instructive text.

Tables: Some tables allow you to add additional rows as needed. To add a row within this form: place your cursor within any column of the table, and then select the plus sign (+) at the end of the row.

- For the purposes of this form, tables 5.1, 7.2, and 10.1 allows you to add rows. However, within OLDC, you will be unable to add or delete rows and Column 1 of each table will be read-only.

Please note: There is no requirement for CSBG grantees to use this tool. This tool cannot be submitted in lieu of the CSBG State Plan within GrantSolutions.gov neither can this tool be attached within GrantSolutions.gov as the official submission.

SECTION 1: CSBG Administrative Information

1.1. Identify whether this is a one-year or a two-year plan. Choose an item.

1.1a. Provide the federal fiscal years this plan covers: **Year One** 2024
Year Two 2025

GUIDANCE: If a state indicates “One-Year” under 1.1., they will only have to provide a response for “Year One”.

1.2. Lead Agency and Authorized Official: Update the following information in relation to the lead agency and authorized official designated to administer CSBG in the state, as required by Section 676(a) of the CSBG Act. Information should reflect the responses provided in the Application for Federal Assistance, SF-424M.

Has information regarding the state lead agency and authorized official changed since the last submission of the State Plan? ☐ Yes ☐ No No

If yes, select the fields that have changed. [\[Check all the apply\]](#)

- | | | |
|--|--|--|
| <input type="checkbox"/> Lead Agency | <input type="checkbox"/> Department Type | <input type="checkbox"/> Department Name |
| <input type="checkbox"/> Authorized Official | <input type="checkbox"/> Street Address | <input type="checkbox"/> City |
| <input type="checkbox"/> Zip Code | <input type="checkbox"/> Office Number | <input type="checkbox"/> Fax Number |
| <input type="checkbox"/> Email Address | <input type="checkbox"/> Website | |

1.2a. Lead agency [\[Narrative, 150 Characters\]](#) Tennessee Department of Human Services

GUIDANCE: Please only provide the exact name of the CSBG state lead agency as designated within the designation letter and an acronym (as applicable).

EXAMPLE: Office of Community Services (OCS)

1.2b. Cabinet or administrative department of this lead agency [\[Check one and provide a narrative where applicable\]](#)

- ☐ Community Affairs Department
- ☐ Community Services Department
- ☐ Governor’s Office
- ☐ Health Department
- ☐ Housing Department
- ☒ Human Services Department
- ☐ Social Services Department
- ☐ Other, describe: [\[Narrative, 100 characters\]](#)

1.2c. Cabinet or Administrative Department Name: Provide the name of the cabinet or administrative department of the CSBG authorized official [\[Narrative, 100 Characters\]](#) Tennessee Department of Human Services

- 1.2d. Authorized Official of the Lead Agency:** The authorized official could be the director, secretary, commissioner etc. as assigned in the designation letter (attached under item 1.3.). The authorized official is the person indicated as the authorized representative on the SF-424M and the official recipient of the Notice of Award per Office of Grant Management requirements. [\[Narrative, 50 characters each\]](#)

Name Clarence H. Carter

Title Commissioner

- 1.2e. Street Address** [\[Narrative, 200 characters\]](#) 505 Deaderick Street

- 1.2f. City** [\[Narrative, 50 characters\]](#) Nashville

- 1.2g. State** [\[Dropdown\]](#) Tennessee

- 1.2h. Zip Code** [\[Numerical Response, 5 digits\]](#) 37243

- 1.2i. Telephone Number** [\[Numerical Response, 10-15 digits\]](#) 615-313-4702

- 1.2j. Fax Number** [\[Numerical Response, 10 digits\]](#) 615-741-4165

- 1.2k. Email Address** [\[Narrative, 150 characters\]](#) Clarence.H.Carter@tn.gov

- 1.2l. Lead Agency Website** [\[Narrative, 200 characters\]](#)
<https://www.tn.gov/humanservices.html>

Note: Item 1.2. pre-populates the Annual Report, Module 1, Item A.1.

- 1.3. Designation Letter:** Attach the state's official CSBG designation letter. A new designation letter is required if the chief executive officer of the state and/or designated agency has changed. [\[Attach a document.\]](#)

GUIDANCE: The designation letter should be updated whenever there is a change to the designee.

INSTRUCTIONAL NOTE: The letter should be from the chief executive officer of the state and include, at minimum, the designated state CSBG lead agency (office, department, or bureau) and title of the authorized official of the lead agency who is to administer the CSBG grant award.

- 1.4. CSBG Point of Contact:** Provide the following information in relation to the designated state CSBG point of contact. The state CSBG point of contact should be the person that will be the main point of contact for CSBG within the state.

Has information regarding the state point of contact changed since the last submission of the State Plan? ☐ Yes ☐ No Yes

If yes, select the fields that have changed. [\[Check all the apply\]](#)

- | | | | |
|---|--|---|-------------------------------------|
| <input type="checkbox"/> Agency Name | <input checked="" type="checkbox"/> Point of Contact | <input type="checkbox"/> Street Address | <input type="checkbox"/> City |
| <input type="checkbox"/> State | <input type="checkbox"/> Zip Code | <input type="checkbox"/> Office Number | <input type="checkbox"/> Fax Number |
| <input checked="" type="checkbox"/> Email Address | <input type="checkbox"/> Website | | |

- 1.4a.** Agency Name [Narrative, 150 characters] Tennessee Department of Human Services
- 1.4b.** Point of Contact Name [Narrative, 50 characters each]
 Name Lindsay Whittin
 Title Program Director
- 1.4c.** Street Address [Narrative, 200 characters] 505 Deaderick Street
- 1.4d.** City [Narrative, 50 characters] Nashville
- 1.4e.** State [Dropdown] Tennessee
- 1.4f.** Zip Code [Numerical Response, 5 digits] 37243
- 1.4g.** Telephone Number [Numerical Response, 10 – 15 digits] 615-532-7351
- 1.4h.** Fax Number [Numerical Response, 10 digits] 615-532-7351
- 1.4i.** Email Address [Narrative, 150 characters] Lindsay.Whittin@tn.gov
- 1.4j.** Agency Website [Narrative, 200 characters]
<https://www.tn.gov/humanservices.html>
- 1.5.** Provide the following information in relation to the State Community Action Association.
- There is currently a state Community Action Association within the state.**
☐ Yes ☐ No Yes
- Has information regarding the state Community Action Association changed since the last submission of the State Plan?**
☐ Yes ☐ No No
- If yes, select the fields that have changed. [Check all the apply]
- | | | | |
|--|---|---|--|
| <input type="checkbox"/> Agency Name | <input type="checkbox"/> Executive Director | <input type="checkbox"/> Street Address | <input type="checkbox"/> City |
| <input type="checkbox"/> State | <input type="checkbox"/> Zip Code | <input type="checkbox"/> Office Number | <input checked="" type="checkbox"/> Fax Number |
| <input type="checkbox"/> Email Address | <input type="checkbox"/> Website | <input type="checkbox"/> RPIC Lead | |
- 1.5a.** Agency name [Narrative, 150 characters] Tennessee Association of Community Action (TACA)
- 1.5b.** Executive Director or Point of Contact [Narrative, 50 characters each]
 Name Kreda Yokley
 Title Executive Director
- 1.5c.** Street Address [Narrative, 200 characters] 800 2nd Avenue North
- 1.5d.** City [Narrative, 50 characters] Nashville
- 1.5e.** State [Dropdown] Tennessee
- 1.5f.** Zip Code [Numerical Response, 5 digits] 37201

- 1.5g. **Telephone Number** [Numerical Response, 10 – 15 digits] (615)714-3299
- 1.5h. **Fax Number** [Numerical Response, 10 digits] (423)246-5682
- 1.5i. **Email Address** [Narrative, 150 characters] kreda4taca@gmail.com
- 1.5j. **State Association Website** [Narrative, 200 characters]
<http://www.tncommunityaction.org/>
- 1.5k. **State Association currently serves as the Regional Performance Innovation Consortia (RPIC) lead** ☐ Yes ☐ No No

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SECTION 2: State Legislation and Regulation

- 2.1. **CSBG State Legislation:** State has a statute authorizing CSBG. ☐ Yes ☐ No Yes
- 2.2. **CSBG State Regulation:** State has regulations for CSBG. ☐ Yes ☐ No No
- 2.3. **Legislation/Regulation Document:** Attach the legislation and/or regulations or provide a hyperlink(s) to the documents indicated under Items 2.1. and/or Item 2.2. [\[Attach a document and/or provide a link, 1500 characters\]](#)

GUIDANCE: The labeling of all attachments should include the question number for which the document provides supplementary information, the question heading, and the type of document provided. As an example, a state statutory document could be labeled as:

2.3. Legislation/Regulation Document, Washington D.C. Statute

- 2.4. **State Authority:** Select a response for each of the following items about the state statute and/or regulations authorizing CSBG:
- 2.4a. **Authorizing Legislation:** State legislature enacted authorizing legislation or amendments to an existing authorizing statute last federal fiscal year. ☐ Yes ☐ No No
- 2.4b. **Regulation Amendments:** State established or amended regulations for CSBG last federal fiscal year. ☐ Yes ☐ No No

SECTION 3: State Plan Development and Statewide Goals

- 3.1. CSBG Lead Agency Mission and Responsibilities:** Briefly describe the mission and responsibilities of the state agency that serves as the CSBG lead agency. [Narrative, 2500 characters]

TDHS's Mission is to build strong families by connecting Tennesseans to employment, education, and support services. TDHS's Vision is to revolutionize the customer experience through innovation and a seamless network of services.

The Tennessee Department of Human Services (TDHS) is responsible for administering Temporary Assistance for Needy Families (Families First), Supplemental Nutrition Assistance Program, Child Care Development Fund and Child Care Services, Vocational Rehabilitation (Tennessee Business Enterprise and the Tennessee Rehabilitations Centers), Blind and Visually Impaired Services, Deaf, Sensory Services, Disability Determination Services, Independent Living Services, the Tennessee Technology Access Program (Assistive Technology Services), Adult Day Services, Adult Protective Services, Social Services Block Grant (Adult Services), and Child Support.

TDHS partners with a network of twenty (20) local Community Action Agencies (CAAs) that provides programs and services throughout each of the 95 counties with the support of the Community Services Block Grant (CSBG).

- 3.2. State Plan Goals:** Describe the state's CSBG-specific goals for state administration of CSBG under this State Plan. [Narrative, 3000 characters]

TDHS's CSBG Unit's purpose statement is that "Everybody should have equal opportunity to achieve their highest potential in partnership with their families and communities."

CSBG has established four primary goals – Strength, Transformation, Accountability, and Resources or STAR – that are explained below to work toward this mission.

S – Strength

- The CSBG unit will collaborate with agencies to strengthen agencies' board governance and fiscal practices through the use of the CSBG Performance Management System to decrease audit findings and increase agencies' ability to support customers.

T – Transformation

- The CSBG unit will collaborate with agencies to develop, implement, and sustain methods for using CSBG funds to help customers meet their goals

through new and innovative intake and service delivery practices that account for not only the person's needs, but also goals.

A – Accountability

- The CSBG unit will collect and analyze agency data to engage agencies in the process of continuous quality improvement by targeting and improving deficiencies through measurable change.

R –Resources

- The CSBG unit will link agencies to training, technical assistance, key stakeholders/partners, and other resources, including new resources within the department and the state to expand the service array for customers.

TDHS will partner with the Tennessee Association of Community Action (TACA) by allocating a portion of the state's administrative funds to TACA to provide training and technical assistance and support the development of a strategic plan to provide a catalyst for long-term investment into the state's community action network.

A key component to strengthening agencies' capacity will be through training and technical assistance, not only of staff, but the board, and the community as agencies increase their capacity to build upon initiatives through the two-generation whole family approach incorporating the Human Capacity Community Transformation (HCCT). TDHS will facilitate multiple learning opportunities through the development of Training and Technical Assistance Action plan and implementation of a statewide learning community, which will continue to evolve to meet the needs of agencies and the customers they support through a customer-centered approach and a process of continuous quality improvement. Through engagement with the learning community, TDHS will focus on the following areas for process improvements:

- Training/Technical Assistance
- Communication
- Performance Management
- Organizational Standards Assessment
- Fund Utilization

Additionally, TDHS will participate in several committees, work groups, and councils that will encourage information sharing and enhance process improvements for the State Office, State Association, and eligible CSBG entities.

GUIDANCE: States should consider feedback from OCS, their eligible entities, and the ACSI survey completed by eligible entities when creating their State Plan goals.

Instructional Note: For examples of “goals,” see State Accountability Measure 1Sa(i).

Note: This information is associated with State Accountability Measure 1Sa(i) and pre-populates the state’s Annual Report, Module 1, Item B.1.

3.3. State Plan Development: Indicate the information and input the state accessed to develop this State Plan.

3.3a. Analysis of state-level tools [Check all that applies and provide additional information where applicable]

- ☒ State Performance Indicators and/or National Performance Indicators (NPIs)
- ☒ U.S. Census data
- ☒ State Performance Management Data (e.g., accountability measures, ACSI survey information, and/or other information from annual reports)
- ☒ Monitoring Visits/Assessments
- ☒ Tools Not Identified Above (specify) [Narrative, 500 characters]

Monthly Reports, Fiscal invoicing, Single Audit Reports, RPIC and T/TA Plans

3.3b. Analysis of local-level tools [Check all that applies and provide additional information where applicable]

- ☒ Eligible Entity Community Needs Assessments
- ☒ Eligible Entity Community Action Plans
- ☒ Public Hearings/Workshops
- ☐ Tools Not Identified Above (e.g., state required reports) [specify] [Narrative, 500 characters]

3.3c. Consultation with [Check all that applies and provide additional information where applicable]

- ☒ Eligible Entities (e.g., meetings, conferences, webinars; not including the public hearing)
- ☒ State Association
- ☒ National Association for State Community Services Programs (NASCSPP)
- ☒ Community Action Partnership (NCAP)
- ☒ Community Action Program Legal Services (CAPLAW)
- ☐ CSBG Tribal Training and Technical Assistance (T/TA) provider
- ☒ Regional Performance Innovation Consortium (RPIC)
- ☒ Association for Nationally Certified ROMA Trainers (ANCRT)
- ☒ Federal CSBG Office
- ☒ Organizations not identified above (specify) [Narrative, 500 characters]

3.4. Eligible Entity Involvement

3.4a. State Plan Development: Describe the specific steps the state took in developing the State Plan to involve the eligible entities. [\[Narrative, 3000 Characters\]](#)

Note: This information is associated with State Accountability Measures 1Sa(ii) and may pre-populate the state's annual report form.

On July 28, 2023, TDHS sent an official Public Hearing Notice and advisory to CSBG providers, partners and posted a working draft of the CSBG Model State Plan to the TDHS website in order to open the public comment period.. TDHS emailed a copy of the proposed FY24-25 Model State Plan on July 28, 2023, for eligible entities to review and provide feedback. In addition, eligible entities were provided notice of the public hearing scheduled for August 11, 2023. The public comment period closed on August 28, 2023.

3.4b. Performance Management Adjustment: Describe how the state has adjusted its State Plan development procedures under this State Plan, as compared to previous State Plans, in order to 1) encourage eligible entity participation and 2) ensure the State Plan reflects input from eligible entities? Any adjustment should be based on the state's analysis of past performance in these areas, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail. [\[Narrative, 3000 Characters\]](#)

Note: This information is associated with State Accountability Measures 1Sb(i) and (ii) and pre-populate the Annual Report, Module 1, Item B.1.

TDHS has continued engaging with the CSBG Task Force, which is an interagency council that meets at least twice a year to collaborate with TDHS and other agencies to leverage opportunities, resources, address policies and procedures that may inhibit service delivery and customer outcomes; and work collectively to develop a universal application and a reporting system that supports continuous quality improvement.

In early March 2023, TDHS partnered with TACA to distribute a survey for all eligible entities regarding training and technical assistance needs. Additionally, the CSBG Task Force provides feedback and recommendations in concert with TACA and TDHS to develop a plan that meets the needs of the entire network.

3.5. Eligible Entity Overall Satisfaction: Provide the state's target for eligible entity Overall Satisfaction during the performance period. [\[3 digits\]](#) **Year One** 72 **Year Two** 75

Instructional Note: The state's target score will indicate improvement or maintenance of the states' Overall Satisfaction score from the most recent American Customer Survey Index (ACSI) survey of the state's eligible entities.

Note: Item 3.5 is associated with State Accountability Measure 8S and may pre-populate the state’s annual report form.

GUIDANCE: The targets reported here should match the future target set in the Annual Report, Section B, Table B.2.

GUIDANCE: Review the [ACSI IM](#) about setting targets for your eligible entity overall satisfaction that are realistic, reasonable, attainable, and possible.

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SECTION 4: CSBG Hearing Requirements

- 4.1. Public Inspection:** Describe the steps taken by the state to disseminate this State Plan to the public for review and comments prior to the public hearing, as required under Section 676(e)(2) of the Act. [Narrative, 2500 Characters]

GUIDANCE: Under this question, detail how the state provided the State Plan to the public, including providing sufficient time (ideally no fewer than 30 days) for the public to provide feedback prior to the public hearing. Distribution to the public should include distribution directly to the eligible entities (e.g. via email or publication on a public website with specific notification to the eligible entities) in the state as well as any other interested parties.

On July 28, 2023, TDHS sent an official Public Hearing Notice and advisory to CSBG providers, partners and posted a working draft of the CSBG Model State Plan to the TDHS website, in order to open the public comment period.. TDHS also emailed a copy of the proposed FY24-25 Model State Plan on July 31, 2023, for eligible entities to review and provide feedback. In addition, eligible entities were provided notice of the public hearing scheduled for August 11, 2023. Reminders to provide comments on the proposed State Plan will be included in the weekly email to community action agencies. A request for comments was also made at the quarterly TACA meeting on August 8, 2023. A copy of the proposed FY24-25 Model State Plan was also shared for comment with partner state agencies through the Job Seekers Workgroup and the Homeless Support Call Workgroup and the Tennessee Association for Human Resource Agencies (TAHRA). The public comment period closed on August 28, 2023.

- 4.2. Public Notice/Hearing:** Describe how the state ensured there was sufficient time and statewide distribution of notice of the public hearing(s) to allow the public to comment on the State Plan, as required under 676(a)(2)(B) of the CSBG Act. [Narrative, 2500 Characters]

The Public Hearing was held virtually on August 11, 2023, to provide all eligible entities and the public easy access for attendance. The public hearing took place 14 days after the plan was posted on the website, and the agencies were notified of the proposed plan. TDHS will accept public comment until August 28, 2023 to meet the 30-day window for public comment.

- 4.3. Public and Legislative Hearings:** In the table below, specify the date(s) and location(s) of the public and legislative hearing(s) held by the designated lead agency for this State Plan, as required under Section 676(a)(2)(B) and Section 676(a)(3) of the Act.

Instructional Note: A public hearing is required for each new submission of the State Plan. The date(s) for the public hearing(s) must have occurred in the year prior to the first federal fiscal year covered by this plan. Legislative hearings are held at least every

three years, and must have occurred within the last three years prior to the first federal fiscal year covered by this plan.

Date <i>[Select a Date]</i>	Location <i>[Provide the facility and city – Narrative 100 characters]</i>	Type of Hearing <i>[Select an option]</i>	If a Combined Hearing was held confirmed that the public was invited.
8/24/2022	House Fiscal Review Committee	Legislative	<input type="checkbox"/>
8/11/2023	Virtual - WebEx	Public	<input type="checkbox"/>

NOTE: ADD-A-ROW function – States can add rows as needed for each hearing as needed. To add a row within this form: highlight the row and then select the plus sign (+) at the end of the row.

GUIDANCE: A combined hearing refers to having one joint public and legislative hearing.

- 4.4.** Attach supporting documentation or a hyperlink for the public and legislative hearings.
[Attach supporting documentation or provide a hyperlink(s), 500 characters]

GUIDANCE: Supporting documentation may include, but is not limited to, agendas, sign-in sheets, transcripts, and notices/advertisements of the hearings. All attachments should include the question number, question heading, type of document and the date of the hearing/meeting (as applicable).

EXAMPLE NAMING CONVENTION: 4.4. Public and Legislative Hearings Agenda 062117

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SECTION 5: CSBG Eligible Entities

5.1. CSBG Eligible Entities: In the table below, indicate whether each eligible entity in the state is public or private, the type(s) of entity, and the geographical area served by the entity.

CSBG Eligible Entity	Geographical Area Served (by county) [Provide all counties]	Public or Nonprofit	Type of Entity [Choose all that apply]
Anderson County	Anderson county	Nonprofit	Community Action Agency
Blount County Community Action Agency, Inc.	Blount county	Nonprofit	Community Action Agency
Bradley Cleveland Community Services Agency	Bradley county	Public	Community Action Agency
City of Chattanooga	Hamilton county	Public	Community Action Agency
Clarksville- Montgomery County Community Action Agency	Montgomery county	Nonprofit	Community Action Agency
Delta Human Resource Agency	Fayette county, Lauderdale county, Tipton county	Public	Community Action Agency
Douglas- Cherokee Economic Authority, Inc.	Cocke county, Grainger county, Hamblen county, Jefferson county, Monroe county, Sevier county	Nonprofit	Community Action Agency, Limited Purpose Agency
Highland Rim Economic Corporation	Dickson county, Houston county, Humphreys county, Stewart county	Nonprofit	Community Action Agency, Limited Purpose Agency
Knoxville Knox County Community Action Committee	Knox county	Public	Community Action Agency
Metropolitan Action Commission	Davidson county	Public	Community Action Agency
Mid-Cumberland Community Action Agency, Inc.	Cheatham county, Robertson county, Rutherford county, Sumner county, Trousdale county, Williamson county, Wilson county	Nonprofit	Community Action Agency
Mid-East Community Action Agency	Louden county, Roane county	Nonprofit	Community Action Agency
Northwest Tennessee Economic	Benton county, Carroll, Dyer county, Gibson county, Henry county, Lake	Nonprofit	Community Action Agency, Limited Purpose Agency

CSBG Eligible Entity	Geographical Area Served (by county) [Provide all counties]	Public or Nonprofit	Type of Entity [Choose all that apply]
Development Council	county, Obion county, Weakley county		
Shelby County	Shelby county	Public	Community Action Agency
South Central Human Resource Agency, Inc.	Bedford County, Coffee County, Franklin County, Giles County, Hickman County, Lawrence County, Lewis County, Lincoln County, Marshall County, Maury County, Moore County, Perry County, Wayne County	Public	Community Action Agency
Southeast Tennessee Human Resource Agency	Bledsoe County, Grundy County, Marion County, McMinn County, Meigs County, Polk County, Rhea County, Sequatchie County	Public	Community Action Agency
Southwest Human Resource Agency	Chester County, Decatur County, Hardeman County, Hardin County, Haywood County, Henderson County, Madison County, McNairy County, Madison County	Public	Community Action Agency
Upper Cumberland Human Resource Agency, Inc.	Cannon County, Clay County, Cumberland County, DeKalb County, Fentress County, Jackson County, Macon County, Overton County, Pickett County, Putnam County, Smith County, VanBuren County, Warren County, White County	Public	Community Action Agency
Upper East Tennessee Human Development Agency	Carter County, Greene County, Hancock County, Hawkins County, Johnson County, Sullivan County, Unicoi County, Washington County	Nonprofit	Community Action Agency
Mountain Valley Economic Opportunity Authority	Campbell County, Claiborne County, Morgan County, Scott County, Union County	Nonprofit	Community Action Agency, Limited Purpose Agency

NOTE: WITHIN OLDC, you will not be able to add-a-row. Any additions/deletions to the Eligible Entity List should be made within the CSBG Eligible Entity List within OLDC prior to initializing a new CSBG State Plan within OLDC. To add a row within this form: highlight the row and then select the plus sign (+) at the end of the row. Geographical Area Served allows for 550 characters.

Note: Table 5.1. pre-populates the Annual Report, Module 1, Table C.1.

GUIDANCE: Under *Type of Entity*, select more than one type by holding down the CTRL key while making selections.

NOTE: Whether nonprofit or public, entities that receive CSBG funds are generally considered to be Community Action Agencies for the purpose of administering CSBG. The only

specific exceptions outlined in the CSBG Act are Limited Purpose Agencies, Migrant and Seasonal Farmworker organizations, and Tribes and Tribal Organizations

INSTRUCTIONAL NOTE: Limited Purpose Agency refers to an eligible entity that was designated as a limited purpose agency under Title II of the Economic Opportunity Act of 1964 for fiscal year 1981, that served the general purposes of a community action agency under Title II of the Economic Opportunity Act, that did not lose its designation as a limited purpose agency under Title II of the Economic Opportunity Act as a result of failure to comply with that Act and that has not lost its designation as an eligible entity under the CSBG Act.

INSTRUCTIONAL NOTE: 90 percent funds are the funds a state provides to eligible entities to carry out the purposes of the CSBG Act. As described under Section 675C of the CSBG Act, a state must provide to the eligible entities “not less than 90 percent” of their CSBG allocation “made available to a state under Section 675A or 675B.

5.2. Total number of CSBG eligible entities: 20
[Within OLDC, this will automatically update based on Table 5.1.]

5.3. Changes to Eligible Entities List: Within the tables below, describe any changes that have occurred to the eligible entities within the state since the last federal fiscal Year (FFY), as applicable.

One or more of the following changes were made to the eligible entity list: [\[Check all that apply\]](#).

- ☐ Designation and/or Re-Designation
- ☐ De-Designations and/or Voluntary Relinquishments
- ☐ Mergers
- ☒ No Changes to Eligible Entities List

GUIDANCE: The following three questions will only need to be answered based on your response to 5.3.

5.3a. Designation and Re-Designation: Identify any new entities that have been designated as eligible entities, as defined under Section 676A of the Act, since the last federal fiscal year. Include any eligible entities designated to serve an area previously not served by CSBG as well as any entities designated to replace another eligible entity that was terminated (de-designated) or that voluntarily relinquished its status as a CSBG eligible entity.

CSBG Eligible Entity	Type	Start Date	Geographical Area Served
Click or tap here to enter text.	Choose an item.	Click or tap to enter a date.	

NOTE: ADD-A-ROW FUNCTION – states can add rows as needed within OLDC. To add a row within this form: highlight the row and then select the plus sign (+) at the end of the row. Geographical Area Served allows for 550 characters.

GUIDANCE: A designation refers to an entity that was not receiving funding in the previous federal fiscal year(s) and/or was not included in the previous CSBG State Plan. Re-designation refers to an entity that is already designated/receiving funds but is now receiving funds to serve an additional geographic area previously served by another entity. A permanent re-designation **must be conducted -in line with procedures outlined in Section 676A of the CSBG Act.** An interim re-designation may be noted when an entity has been identified to provide services after a voluntary relinquishment pending official designation of a permanent entity consistent with the requirements of Section 676A. See CSBG Act 676A, *Designation and Redesignation...*, for more information.

- 5.3b. De-Designations and Voluntary Relinquishments:** Identify any entities that are no longer receiving CSBG funding. Include any eligible entities have been terminated (de-designated) as defined under Section 676(c) and Section 676C of the Act, or voluntarily relinquished their CSBG eligible entity status since the last federal fiscal year.

CSBG Eligible Entity	Reason
Click or tap here to enter text.	Choose an item.

NOTE: ADD-A-ROW FUNCTION – states can add rows as needed within OLDC. To add a row within this form: highlight the row and then select the plus sign (+) at the end of the row.

- 5.3c. Mergers:** In the table below, provide information about any mergers or other combinations of two or more eligible entities that were individually listed in the prior State Plan.

Original CSBG Eligible Entities	Surviving CSBG Eligible Entity	New Name (as applicable)	DUNS No.
Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.

NOTE: ADD-A-ROW FUNCTION – states can add rows as needed within OLDC. To add a row within this form: highlight the row and then select the plus sign (+) at the end of the row.

GUIDANCE: This question refers to the merger or other combinations of two or more existing CSBG eligible entities only.

Under 5.3c, please only include two or more **previously designated** eligible entities that have merged or combined in order to provide CSBG services.

SECTION 6: Organizational Standards for Eligible Entities

Note: Reference IM 138, *State Establishment of Organizational Standards for CSBG Eligible Entities*, for more information on Organizational Standards. Click [HERE](#) for IM 138.

6.1. Choice of Standards: Confirm whether the state will implement the CSBG Organizational Standards Center of Excellence (COE) organizational standards (as described in IM 138) or an alternative set during the federal fiscal year(s) of this planning period. [\[Select one\]](#)

- ☒ COE CSBG Organizational Standards
- ☐ Modified Version of COE CSBG Organizational Standards
- ☐ Alternative Set of organizational standards

Note: Item 6.1. pre-populates the Annual Report, Module 1, Item D.1.

6.1a. Modified Organizational Standards: In the case that the state is requesting to use modified COE-developed organizational standards, provide the proposed modification for the FFY of this planning period including the rationale.

[\[Narrative, 2500 characters\]](#)

6.1b. Alternative Organizational Standards: If using an alternative set of organizational standards, attach the complete list of alternative organizational standards. [\[Attachment \(as applicable\)\]](#)

6.1c. Alternative Organizational Standards: If using an alternative set of organizational standards: 1) provide any changes from the last set provided during the previous State Plan submission; 2) describe the reasons for using alternative standards; and 3) describe how they are at least as rigorous as the COE- developed standards.

☐ There were no changes from the previous State Plan submission [\[If not selected, provide a narrative, 2500 characters\]](#)

Provide reason for using alternative standards [\[Narrative, 2500 characters\]](#)

Describe rigor compared to COE-developed Standards [\[Narrative, 2500 characters\]](#)

6.2. Implementation: Check the box that best describes how the state officially adopted organizational standards for eligible entities in a manner consistent with the state’s administrative procedures act. If “Other” is selected, provide a timeline and additional information, as necessary. [Check all that applies and provide a narrative (as applicable)]

- ☐ Regulation
- ☒ Policy
- ☒ Contracts with Eligible Entities
- ☐ Other, describe: [Narrative, 4000 characters]

6.3. Organizational Standards Assessment: Describe how the state will assess eligible entities against organizational standards this federal fiscal year(s). [Check all that applies]

- ☐ Peer-to-Peer Review (with validation by the state or state-authorized third party)
- ☒ Self-Assessment (with validation by the state or state-authorized third party)
- ☐ Self-Assessment/Peer Review with State Risk Analysis
- ☐ State-Authorized Third-Party Validation
- ☒ Regular On-Site CSBG monitoring
- ☐ Other [Narrative, 2500 characters]

6.3a. Assessment Process: Describe the planned assessment process. [Narrative, 4000 characters]

GUIDANCE: Descriptions should also include improvements to the process made since the previous year including any new processes to increase efficiency or consistency of assessments.

TDHS provides monitoring through the Office of Inspector General (OIG). Each agency completes the Self-Assessment Tool to gauge their ability to fulfill the COE Organizational Standards as outlined in CSBG Internal Memorandum 138. TDHS validates agency responses annually through a combination of desk reviews and onsite or virtual visits. Agencies not assessed through an onsite or virtual visit are assessed utilizing the COE Organizational Standards State Assessment Tool.

TDHS works with agencies to ensure all documentation is provided through the assessment process. In the event an agency is determined to be out of compliance, TDHS requires the agency to establish a corrective action plan. If the agency requires additional assistance, TDHS offers training and technical assistance through a Training Assistance Plan (TAP) or Quality Improvement Plan (QIP) and partners with TACA to provide this training and technical assistance. TDHS continues to monitor agencies’ compliance until any findings have been alleviated.

- 6.4. Eligible Entity Exemptions:** Will the state make exceptions in applying the organizational standards for certain eligible entities due to special circumstances or organizational characteristics (as described in IM 138)? ☐ Yes ☐ No No

GUIDANCE: You will only need to respond to the following question if you responded “yes” to 6.4.

- 6.4a.** Provide the specific eligible entities the state will exempt from meeting organizational standards and provide a description and a justification for each exemption. Total Number of Exempt Entities: [Auto – calculated] **Note: this form will not auto-calculate, please enter the number of exempt entities:** Click or tap here to enter text.

CSBG Eligible Entity	Description/Justification
Click or tap here to enter text.	

NOTE: ADD-A-ROW FUNCTION – states can add rows for each additional exception. To add a row within this form: highlight the row and then select the plus sign (+) at the end of the row. The Description/Justification allows for 2500 characters.

- 6.5. Performance Target:** Provide the percentage of eligible entities that the state expects to meet all the state-adopted organizational standards for the FFY(s) of this planning period. [Insert a percentage] **Year One 85 % Year Two 90 %**

Note: Item 6.5. is associated with State Accountability Measures 6Sa and pre-populates the Annual Report, Module 1, Table D.2.

GUIDANCE: Prior to setting the target, states should review [IM 138](#), review previous performance, and collaborate with the eligible entities and the state association to identify targets

SECTION 7: State Use of Funds

Eligible Entity Allocation (90 Percent Funds) [Section 675C(a) of the CSBG Act]

7.1. Formula: Select the method (formula) that best describes the current practice for allocating CSBG funds to eligible entities. [\[Check one\]](#)

- ☐ Historic
- ☐ Base + Formula
- ☒ Formula Alone
- ☐ Formula with Variables
- ☐ Hold Harmless + Formula
- ☐ Other [\[Narrative, 1500 characters\]](#)

7.1a. Formula Description: Describe the current practice for allocating CSBG funds to eligible entities. [\[Narrative, 4000 characters\]](#)

Funding is allocated to the CSBG agencies based on a rolling three-year average of poverty data from the Census Bureau and is updated annually.

<https://www.census.gov/did/www/saipe/>

7.1b. Statute: Does a state statutory or regulatory authority specify the formula for allocating “not less than 90 percent” funds among eligible entities?

☐ Yes ☐ No

No

7.2. Planned Allocation: Specify the percentage of your CSBG planned allocation that will be funded to eligible entities and in accordance to the “not less than 90 percent funds” requirement as described under Section 675C(a) of the CSBG Act. In the table, provide the planned allocation for each eligible entity receiving funds for the fiscal year(s) covered by this plan.

Year One 91.5%

Year Two 91.5%

Planned CSBG 90 Percent Funds – Year One

CSBG Eligible Entity	Funding Amount (\$)
Anderson County CAC	159,273.77
Blount County CAA	191,774.43
Bradley Cleveland CSA	218,371.05
Chattanooga	667,650.32
Clarksville-Montgomery County CAA	344,233.04
Delta HRA	245,423.07
Douglas Cherokee Economic Authority, Inc.	703,375.36
Highland Rim EC	168,550.77
Knoxville-Knox County CAC	832,870.07
Metro Action Commission	1,289,840.74
Mid-Cumberland CAA	1,177,596.24

CSBG Eligible Entity	Funding Amount (\$)
Mid-East CAA	187,157.98
Mt. Valley EOA	384,325.88
Northwest TN EDC	594,546.60
Shelby County	2,485,698.39
South Central HRA	863,318.77
Southeast TN HRA	434,816.30
Southwest HRA	626,137.98
Upper Cumberland HRA	823,677.36
Upper East TN HDA	1,158,345.00
Total (Auto-calculated)	\$ 13,556,983.13

NOTE: WITHIN OLDC, the add-a-row function will not be available on this table and the first column is read-only. To add a row within this form: highlight the row and then select the plus sign (+) at the end of the row. To auto-calculate, select the "\$0.00", right-click, and then select "Update Field".

Planned CSBG 90 Percent Funds – Year Two

CSBG Eligible Entity	Funding Amount (\$)
Anderson County CAC	159,273.77
Blount County CAA	191,774.43
Bradley County CSA	218,371.05
Chattanooga	667,650.32
Clarksville-Montgomery County CAA	344,233.04
Delta HRA	245,423.07
Douglas Cherokee Economic Authority, Inc.	703,375.36
Highland Rim EC	168,550.77
Knoxville Knox County CAC	832,870.07
Metro Action Commission	1,289,840.74
Mid-Cumberland CAA	1,177,596.24
Mid-East CAA	187,157.98
Mt. Valley EOA	384,325.88
Northwest TN EDC	594,546.60
Shelby County	2,485,698.39
South Central HRA	863,318.77
Southeast TN HRA	434,816.30
Southwest HRA	626,137.98
Upper Cumberland HRA	823,677.36

CSBG Eligible Entity	Funding Amount (\$)
Upper East TN HDA	1,158,345.00
Total (Auto-calculated)	\$ 13,556,983.13

NOTE: WITHIN OLDC, the add-a-row function will not be available on this table and the first column is read-only. To add a row within this form: highlight the row and then select the plus sign (+) at the end of the row. To auto-calculate, select the "\$0.00", right-click, and then select "Update Field".

Note: This information pre-populates the state's Annual Report, Module 1, Table E.2.

- 7.3. Distribution Process:** Describe the specific steps in the state's process for distributing 90 percent funds to the eligible entities and include the number of days each step is expected to take. Please include information about state legislative approval or other types of administrative approval (such as approval by a board or commission).
[Narrative, 4000 characters]

TDHS exceeds the 90% pass through requirement by allocating 91.5% of available CSBG funds, through the state's contracting process.

When submitting a contract or contract amendment for processing, all internal department program approvals need to be completed and the routing packet submitted to TDHS budget at least 90 days prior to the effective date of the contract or amendment. State CSBG Program staff collaborate annually with the TDHS budget and procurement divisions to establish budgets based upon the previous federal allocation. Once the Scope of Services has been updated, or amendment(s) have been established, the contract documents are routed for approval internally and through the state's Central Procurement Office (CPO). Once the Delegated Grant Authority and Grant Contract have been approved by CPO, the contracts will be routed to the agencies, to be signed and executed before the start of the federal fiscal year (FFY) or established effective date of the amendment.

- 7.3a. Distribution Method:** Select the option below that best describes the distribution method the state uses to issue CSBG funds to eligible entities:

- ☒ Reimbursement
☐ Advance
☐ Hybrid
☐ Other [Narrative, 4000 characters]

- 7.4. Distribution Timeframe:** Does the state intend to make funds available to eligible entities no later than 30 calendar days after OCS distributes the federal award?

☐ Yes ☐ No

Yes

- 7.4a. Distribution Consistency:** If no, describe state procedures to ensure funds are made available to eligible entities consistently and without interruption.
[Narrative, 4000 characters]

Note: Item 7.4 is associated with State Accountability Measure 2Sa and may pre-populate the state's annual report form.

7.5. Distribution of Funds Performance Management Adjustment: Describe the state's strategy for improving grant and/or contract administration procedures under this State Plan as compared to past plans. Any improvements should be based on analysis of past performance and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any improvements, provide further detail. [Narrative, 4000 characters]

TDHS has realigned the federal allocations from the State Fiscal Year (SFY) to the Federal Fiscal Year (FFY) in 2020, to better facilitate the timely issuance of funds upon availability and to allow the availability of funds to continue through the end of the grant period. Beginning October 1, 2020, funds were aligned through establishing two-year contracts with agencies.

To support this change in performance and grant management, TDHS implemented a new invoicing system to account for concurrent contracts and to manage remaining carryover funds for 13-24 months of a grant contract.

TDHS implemented fund utilization and grant management and training/technical assistance virtual calls with each agency in 2021 and will maintain this level of engagement with CSBG eligible entities over the next two years as a form of performance management. Additionally, beginning in 2023, TDHS will implement a second round of calls 60 days before the new contract cycle. The second round will only include all eligible entities that have spent approximately 80% or less of their carryforward funds.

TDHS is continuing to seek other opportunities for dialogue with and feedback from eligible entities, OCS, and other sources that will inform future improvements to grant and contract administration procedures.

Note: This information is associated with State Accountability Measure 2Sb and may pre-populate the state's annual report form.

Administrative Funds [Section 675C(b)(2) of the CSBG Act]

7.6. Allocated Funds: Specify the percentage of your CSBG planned allocation for administrative activities for the FFY(s) covered by this State Plan.

Year One 5 % **Year Two** 5 %

[Numeric response, specify %]

Note: This information pre-populates the state's Annual Report, Module 1, Table E.4.

7.7. State Staff: Provide the number of state staff positions to be funded in whole or in part with CSBG funds for the FFY(s) covered by this State Plan.

Year One 21 Year Two 21 [Numeric response, 0.00 – 99.99]

7.8. State FTEs: Provide the number of state Full Time Equivalents (FTEs) to be funded with CSBG funds for the FFY(s) covered by this State Plan?

Year One 4 Year Two 4 [Numeric response, 0.00 – 99.99]

Use of Remainder/Discretionary Funds [Section 675C(b) of the CSBG Act]

7.9. Remainder/Discretionary Funds Use: Does the state have remainder/discretionary funds as described in Section 675C(b) of the CSBG Act? ☐ Yes ☐ No Yes

GUIDANCE: “No” should only be selected if the percentages provided under 7.2. and 7.6. equal 100%.

If yes, provide the allocated percentage and describe the use of the remainder/discretionary funds in the table below. **Year One 3.5 % Year Two 3.5 %**

Note: This response will link to the corresponding assurance, Item 14.2.

INSTRUCTIONAL NOTE: The assurance under 676(b)(2) of the Act (Item 14.2 of this State Plan) specifically requires a description of how the state intends to use remainder/discretionary funds to “support innovative community and neighborhood-based initiatives related to the purposes of [the CSBG Act].” Include this description in Item 7.9f of the table below and/or attach the information.

If a funded activity fits under more than one category in the table, allocate the funds among the categories. For example, if the state provides funds under a contract with the State Community Action association to provide training and technical assistance to eligible entities and to create a statewide data system, the funds for that contract should be allocated appropriately between Items 7.9a. – 7.9c. If allocation is not possible, the state may allocate the funds to the primary category with which the activity is associated.

Note: This information is associated with State Accountability Measures 3Sa and pre-populates the Annual Report, Module 1, Table E.7.

Use of Remainder/Discretionary Funds – Year One

Remainder/Discretionary Fund Uses (See 675C(b)(1) of the CSBG Act)	Planned \$	Brief Description of Services and/or Activities
7.9a. Training/Technical Assistance to eligible entities	Click or tap here to enter text.	These planned services/activities will be described in State Plan Item 8.1 [Read-Only]
7.9b. Coordination of state-operated programs and/or local programs	Click or tap here to enter text.	These planned services/activities will be described in State Plan Section 9, State Linkages and Communication [Read-Only]
7.9c. Statewide coordination and communication among eligible	Click or tap here to enter text.	These planned services/activities will be described in State Plan Section 9,

Remainder/Discretionary Fund Uses (See 675C(b)(1) of the CSBG Act)	Planned \$	Brief Description of Services and/or Activities
entities		State Linkages and Communication [Read-Only]
7.9d. Analysis of distribution of CSBG funds to determine if targeting greatest need (Briefly describe under Column 4)	Click or tap here to enter text.	
7.9e. Asset-building programs (Briefly describe under Column 4)	Click or tap here to enter text.	
7.9f. Innovation programs/activities by eligible entities or other neighborhood groups (Briefly describe under Column 4)	\$518,573.13	The funds will target gap areas of TANF and consider special projects that would assist with transforming the social safety net and increasing client capacity to reduce dependency in accordance with the vision of TDHS.
7.9g. State Charity tax credits (Briefly describe under Column 4)	Click or tap here to enter text.	
7.9h. Other activities (Specify these other activities under Column 4)	Click or tap here to enter text.	
Totals (Auto-Calculated)	\$518,573.13	

To auto-calculate, select the "\$0.00", right-click, and then select "Update Field". Each description allows for 4000 characters.

Use of Remainder/Discretionary Funds – Year Two

Remainder/Discretionary Fund Uses (See 675C(b)(1) of the CSBG Act)	Planned \$	Brief Description of Services and/or Activities
7.9a. Training/Technical Assistance to eligible entities	Click or tap here to enter text.	These planned services/activities will be described in State Plan Item 8.1 [Read-Only]
7.9b. Coordination of state-operated programs and/or local programs	Click or tap here to enter text.	These planned services/activities will be described in State Plan Section 9, State Linkages and Communication [Read-Only]
7.9c. Statewide coordination and communication among eligible entities	Click or tap here to enter text.	These planned services/activities will be described in State Plan Section 9, State Linkages and Communication [Read-Only]
7.9d. Analysis of distribution of CSBG funds to determine if targeting greatest need (Briefly describe under Column 4)	Click or tap here to enter text.	
7.9e. Asset-building programs (Briefly describe under Column 4)	Click or tap here to enter text.	
7.9f. Innovation programs/activities by eligible entities or other neighborhood groups (Briefly describe under Column 4)	\$518,573.13	The funds will target gap areas of TANF and consider special projects that would assist with transforming the social safety net and increasing client capacity to reduce dependency

Remainder/Discretionary Fund Uses (See 675C(b)(1) of the CSBG Act)	Planned \$	Brief Description of Services and/or Activities
		in accordance with the vision of TDHS.
7.9g. State Charity tax credits (Briefly describe under Column 4)	Click or tap here to enter text.	
7.9h. Other activities (Specify these other activities under Column 4)	Click or tap here to enter text.	
Totals (Auto-Calculated)	\$518,573.13	

To auto-calculate, select the "\$0.00", right-click, and then select "Update Field". Each description allows for 4000 characters.

GUIDANCE: If the percentages provided under 7.2. and 7.6. do not equal 100%, the remaining percentage should be reported under 7.9. If the state does not have any remainder/discretionary fund activities (as listed in 7.9a. – 7.9g.), the remainder should be described in 7.9h.

7.10. Remainder/Discretionary Funds Partnerships: Select the types of organizations, if any, the state intends to work with (by grant or contract using remainder/discretionary funds) to carry out some or all the activities in Table 7.9. [\[Check all that applies and narrative where applicable\]](#)

- ☐ The State Directly Carries Out All Activities (No Partnerships)
- ☐ The State Partially Carries Out Some Activities
- ☐ CSBG Eligible Entities (if checked, include the expected number of CSBG eligible entities to receive funds) [\[Numeric response, 0 – 100\]](#) Click or tap here to enter text.
- ☒ Other Community-based Organizations
- ☐ State Community Action Association
- ☐ Regional CSBG Technical Assistance Provider(s)
- ☐ National Technical Assistance Provider(s)
- ☐ Individual Consultant(s)
- ☐ Tribes and Tribal Organizations
- ☐ Other [\[Narrative, 2500 characters\]](#)

Note: This response will link to the corresponding CSBG assurance in Item 14.2.

7.11. Use of Remainder/Discretionary Funds Performance Management Adjustment: Describe any adjustments the state will make to the use of remainder/discretionary funds under this State Plan as compared to past State Plans? Any adjustment should be based on the state's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail. [\[Narrative, 4000 characters\]](#)

Note: This information is associated with State Accountability Measures 3Sb and may pre-populate the state's annual report form.

TDHS will utilize 3.5% of CSBG funds for discretionary purposes as allowable under Section 675(b) of the CSBG Act. The funds will target gap areas of TANF and consider special projects that would assist with transforming the social safety net and increasing client capacity to reduce dependency in accordance with the vision of TDHS.

DRAFT

SECTION 8: State Training and Technical Assistance

8.1. Training and Technical Assistance Plan: Describe the state’s plan for delivering CSBG-funded training and technical assistance to eligible entities under this State Plan by completing the table below. The T/TA plan should include all planned CSBG-funded T/TA activities funded through the administrative or remainder/discretionary funds of the CSBG award (as reported in Section 7). The CSBG T/TA plan should include training and technical assistance conducted directly by the state or through partnerships (as specified in 8.3). Add a row for each activity: indicate the timeframe; whether it is training, technical assistance, or both; and the topic.

Note: This information is associated with State Accountability Measure 3Sc and pre-populates the Annual Report, Module 1, Table F.1.

Training and Technical Assistance – Year One

Planned Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of “Other”
All Quarters	Both	Fiscal	<ul style="list-style-type: none"> - Invoicing Webinar: New Invoice and Best Practices for Completion - T/TA at Quarterly TACA Meetings (Finance Advisors) - Annual TACA Conference - Ongoing T/TA - Conduct annual Fund Utilization calls
All Quarters	Both	Governance/Tripartite Boards	<ul style="list-style-type: none"> - Visit Boards periodically through the year - Provide Orientation/Resource Materials - TACA Annual Conference - Provide Training as Needed
All Quarters	Both	Correcting Significant Deficiencies Among Eligible Entities	<ul style="list-style-type: none"> - Provide Training as Needed
All Quarters	Both	Reporting	<ul style="list-style-type: none"> - Annual Report training - Webinars - Provide Training as Needed
All Quarters	Both	ROMA	<ul style="list-style-type: none"> - TACA Quarterly Meetings (Outcome Advisors)

Planned Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of "Other"
			<ul style="list-style-type: none"> - TACA Annual Conference - Provide Training as Needed
Ongoing/Multiple Quarters	Both	Community Assessment	<ul style="list-style-type: none"> - Training to address the causes and conditions of poverty, gaps, etc. - Provide T/TA for specific entities with outstanding CNAs. - Provide T/TA as Needed
Ongoing/Multiple Quarters	Both	Strategic Planning	<ul style="list-style-type: none"> - Provide T/TA for specific entities with outstanding strategic plans - Provide T/TA as Needed
Ongoing/Multiple Quarters	Both	Communication	<ul style="list-style-type: none"> - T/TA will be provided through quarterly newsletter or weekly email communication
Ongoing/Multiple Quarters	Both	Technology	<ul style="list-style-type: none"> - THO Online Application Demo - Webinars regarding state EBMS system
FY1 Q2	Both	Organizational Standards - General	<ul style="list-style-type: none"> - Webinars - Provide T/TA as Needed
FY1 Q1	Both	Other	<ul style="list-style-type: none"> - Webinars/Online training Modules regarding Policy & Procedure Manual
FY1 Q3	Both	Other	<ul style="list-style-type: none"> - Webinars regarding Community Action Plan and CSBG Application

NOTE: ADD-A-ROW FUNCTION – States can add rows for each additional training. To add a row within this form: highlight the row and then select the plus sign (+) at the end of the row. Brief Description of "Other" allows for 500 characters.

Training and Technical Assistance – Year Two

Planned Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of "Other"
All Quarters	Both	Fiscal	<ul style="list-style-type: none"> - Invoicing Webinar: New Invoice and Best Practices for Completion - T/TA at Quarterly

Planned Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of “Other”
			TACA Meetings (Finance Advisors) <ul style="list-style-type: none"> - Annual TACA Conference - Ongoing T/TA - Conduct annual Fund Utilization calls
All Quarters	Both	Governance/Tripartite Boards	<ul style="list-style-type: none"> - Visit Boards periodically through the year - Provide Orientation/Resource Materials - TACA Annual Conference - Provide Training as Needed
All Quarters	Both	Correcting Significant Deficiencies Among Eligible Entities	<ul style="list-style-type: none"> - Provide Training as Needed
All Quarters	Both	Reporting	<ul style="list-style-type: none"> - Annual Report training - Webinars - Provide Training as Needed
All Quarters	Both	ROMA	<ul style="list-style-type: none"> - TACA Quarterly Meetings (Outcome Advisors) - TACA Annual Conference - Provide Training as Needed
Ongoing/Multiple Quarters	Both	Community Assessment	<ul style="list-style-type: none"> - Training to address the causes and conditions of poverty, gaps, etc. - Provide T/TA for specific entities with outstanding CNAs. - Provide T/TA as Needed
Ongoing/Multiple Quarters	Both	Strategic Planning	<ul style="list-style-type: none"> - Provide T/TA for specific entities with outstanding strategic plans - Provide T/TA as Needed
Ongoing/Multiple Quarters	Both	Communication	<ul style="list-style-type: none"> - T/TA will be provided through quarterly newsletter or weekly

Planned Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of "Other"
			email communication
Ongoing/Multiple Quarters	Both	Technology	<ul style="list-style-type: none"> - THO Online Application Demo - Webinars regarding state EBMS system
FY2 Q2	Both	Organizational Standards - General	<ul style="list-style-type: none"> - Webinars - Provide T/TA as Needed
FY2 Q1	Both	Other	<ul style="list-style-type: none"> - Webinars/Online training Modules regarding Policy & Procedure Manual
FY2 Q3	Both	Other	<ul style="list-style-type: none"> - Webinars regarding Community Action Plan and CSBG Application

NOTE: ADD-A-ROW FUNCTION – States can add rows for each additional training. To add a row within this form: highlight the row and then select the plus sign (+) at the end of the row. Brief Description of "Other" allows for 500 characters.

8.1a. Training and Technical Assistance Budget: The planned budget for all training and technical assistance:

Year One \$20,000.00

Year Two \$20,000.00

8.1b. Training and Technical Assistance Collaboration: Describe how the state will collaborate with the State Association and other stakeholders in the planning and delivery of training and technical assistance. [Narrative, 2500 characters]

TDHS has established a standard monthly meeting with TACA to discuss training and technical assistance collaborations and partnering to support CSBG eligible agencies. As a result, TDHS will continue to enlist a partner contract with TACA for investing a portion of the state's administrative funds to provide training and technical assistance through initiatives outlined in the TACA strategic plan. TDHS will continue it's support of the annual Community Action Month event with TACA and the TAHRA conference in order to provide in-person training to frontline staff and eligible entity leadership.

8.2. Organizational Standards Technical Assistance: Does the state have Technical Assistance Plans (TAPs) in place for all eligible entities with unmet organizational standards, if appropriate? ☐ Yes ☐ No ☐ Yes

Note: 8.2 is associated with State Accountability Measure 6Sb. The state should put a TAP in place to support eligible entities with one or more unmet organizational standards.

8.2a. Address Unmet Organizational Standards: Describe the state's plan to provide T/TA to eligible entities to ensure they address unmet Organizational Standards. [Narrative, 2500 characters]

TDHS has previously placed an agency on a Quality Improvement Plan (QIP) after multiple, un-remediated deficiencies within the COE Organizational Standards, which the agency had not alleviated through a Corrective Action Plan (CAP) or a Training Assistance Plan (TAP) and also initiated another Quality Improvement Plan (QIP) with an agency after continued issues with unresponsiveness of communications and missed deadlines.

TDHS plans to take an active role in engaging these agencies in supportive grant management and continue to offer training and technical assistance as requested to alleviate the findings and concerns of communication.

8.3. Training and Technical Assistance Organizations: Indicate the types of organizations through which the state intends to provide training and/or technical assistance as described in Item 8.1, and briefly describe their involvement. (Check all that apply.) [Check all that applies and narrative where applicable]

- ☐ All T/TA is conducted by the state
- ☒ CSBG eligible entities (if checked, provide the expected number of CSBG eligible entities to receive funds) [Numeric response, 0 – 100] 20
- ☒ Other community-based organizations
- ☒ State Community Action Association
- ☒ Regional CSBG technical assistance provider(s)
- ☒ National technical assistance provider(s)
- ☒ Individual consultant(s)
- ☐ Tribes and Tribal Organizations
- ☐ Other [Narrative, 1000 characters]

8.4. CSBG-Funded T/TA Performance Management Adjustment: Describe adjustments the state made to the training and technical assistance plan under this State Plan as compared to past plans. Any adjustment should be based on the state's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail. [Narrative, 2500 Characters]

Note: This information is associated with State Accountability Measures 3Sd and may pre-populate the state's annual report form.

TDHS will develop a State Office Training and Technical Assistance Action Plan in conjunction with TACA. TDHS has established a standard monthly meeting to discuss

training and technical assistance collaborations and partnering to support CSBG eligible agencies. TDHS will partner with TACA by investing a portion of the state's administrative funds to provide training and technical assistance through TACA, as well as the development of a strategic plan that provides a catalyst for long-term investment into the state's community action network.

TDHS will build relationships with community action agencies by conducting annual conversations with each agency about fund utilization, grant management and training and technical assistance needs. TDHS will also utilize annual events, such as the TACA Community Action Month conference and the Tennessee Association of Human Resource Agencies (TAHRA) conference to deliver T/TA and participate in roundtable discussions geared towards sharing best practices and innovative solutions.

DRAFT

SECTION 9: State Linkages and Communication

Note: This section describes activities that the state may support with CSBG remainder/discretionary funds, described under Section 675C(b)(1) of the CSBG Act. The state may indicate planned use of remainder/discretionary funds for linkage/communication activities in Section 7, State Use of Funds, items 7.9(b) and (c).

- 9.1. State Linkages and Coordination at the State Level:** Describe the linkages and coordination at the state level that the state intends to create or maintain to ensure increased access to CSBG services to low-income people and communities under this State Plan and avoid duplication of services (as required by the assurance under Section 676(b)(5)). Describe additional information as needed. [\[Check all that apply from the list below and provide a Narrative, 4000 characters\]](#)

Note: This response will link to the corresponding CSBG assurance, Item 14.5. In addition, this information is associated with State Accountability Measure 7Sa and pre-populates the Annual Report, Module 1, Item G.1.

- ☒ State Low Income Home Energy Assistance Program (LIHEAP) office
- ☒ State Weatherization office
- ☒ State Temporary Assistance for Needy Families (TANF) office
- ☒ Head Start State Collaboration offices
- ☒ State public health office
- ☒ State education department
- ☒ State Workforce Innovation and Opportunity Act (WIOA) agency
- ☒ State budget office
- ☒ Supplemental Nutrition Assistance Program (SNAP)
- ☐ State child welfare office
- ☒ State housing office
- ☐ Other

- 9.2. State Linkages and Coordination at the Local Level:** Describe how the state is encouraging partnerships and collaborations at the state level with public and private sector organizations, to assure the effective delivery and coordination of CSBG services to transform low-income communities and avoid duplication of services (as required by assurances under Section 676(b)(5) – (6)). [\[Narrative, 4000 characters\]](#)

Note: This response will link to the corresponding CSBG assurances, Items 14.5 and 14.6, and pre-populates the Annual Report, Module 1, Item G.2.

[TDHS has established active partnerships both internally and externally to help facilitate and encourage linkage and coordination between agencies and other governmental and community partners. TDHS is actively involved in the State of Tennessee Job Seekers Workgroup and State of Tennessee and CoC Partners Homeless Support Workgroup.](#)

The Job Seekers Workgroup consists of eight (8) state departments and many representatives from various programs within each department that work directly or indirectly with prospective jobs seekers statewide. The Job Seekers Workgroup is tasked with seeking out information regarding Job Seekers' Experiences in seeking employment. In the last year, the Job Seekers Workgroup worked to develop a workforce resilience plan through data gathering and analysis to highlight the barriers Job Seekers encounter when looking for employment and how the WSA's resources assist them along their journey. The workgroup will now use the committee approved recommendations from the plan to help address the root cause of issues job seekers are facing.

In addition, TDHS actively participates in Tennessee Association of Community Action (TACA) and Tennessee Association of Human Resource Agencies (TAHRA) monthly and quarterly meetings and conferences and meets at least quarterly with the Tennessee Housing Development Agency (THDA) to ensure the coordination to housing and energy assistance.

Other identified linkages for building relationships and collaborations with our CSBG Network include but are not limited to:

- Continuum of Care (CoC)
- Tennessee Association of Community Action (TACA)
- Tennessee Housing Development Agency (THDA)
- Tennessee Department of Labor & Workforce
- Tennessee Department of Health (State & Local Counties)
- Workforce Innovation and Opportunity Act (WIOA)
- TDHS Food Programs & Social Services Block Grant (SSBG)
- United Way (Local and Regional)
- Customer-based Advocates

A Continuum of Care (CoC) is a regional or local planning body that coordinates housing and services funding for homeless families and individuals, primarily using funding received through U.S. Department of Housing and Urban Development (HUD).

The Workforce Innovation and Opportunity Act (WIOA) program is administered by the Tennessee Department of Labor & Workforce Development. WIOA includes four (4) partner programs: Workforce Services, Adult Education, Wagner Peyser, and Vocational Rehabilitation.

It is also important that the State Office and CSBG Eligible Entities seek to include and engage the customer's voice to promote effective delivery of and coordination of CSBG

services to low-income communities by utilizing the Human Service Value Curve (HSVC) framework. Through this linkage and coordination, we will together move the needle of community impact to build a network of customer-based advocates to move beyond the need for services to self-sufficiency.

9.3. Eligible Entity Linkages and Coordination

9.3a. State Assurance of Eligible Entity Linkages and Coordination: Describe how the state will assure that eligible entities will partner and collaborate with public and private sector organizations to assure the effective delivery and coordination of CSBG services to low-income people and communities and avoid duplication of services (as required by the assurance under Section 676(b)(5)). [Narrative, 4000 characters]

Note: This response will link to the corresponding CSBG assurance, Item 14.5. and pre-populates the Annual Report, Module 1, Item G.3a.

Through the CSBG Contract, each agency is required to develop interagency planning, coordination, and collaboration at the agency and community level to achieve the highest level of services, strategies, coordination, collaboration, and integration of services. Before TDHS approves an agency's CSBG Community Action Plan, the agency is required to provide a narrative explanation about how they partner with key stakeholders to coordinate and establish linkages through an effective delivery and coordination of CSBG services to low-income people and communities, by addressing the gaps in services, and the duplication of services.

TDHS monitors service delivery strategies throughout the year through monthly and annual reporting provided by agencies. In addition, agencies have developed local service directories listing links and resources, online and through brochures, and respective information and referral systems.

9.3b. State Assurance of Eligible Entity Linkages to Fill Service Gaps: Describe how the eligible entities will develop linkages to fill identified gaps in the services, through the provision of information, referrals, case management, and follow-up consultations, according to the assurance under Section 676(b)(3)(B) of the CSBG Act. [Narrative, 4000 characters]

Note: This response will link to the corresponding CSBG assurance, Item 14.3b. and pre-populates the Annual Report, Module 1, Item G.3b.

Before TDHS accepts the agency's Community Action Plan and Application, the CSBG agency is required to submit a copy of the agency's Community Needs Assessment, Strategic Plan, and provide a narrative explanation about how the agency plans to address the local community needs and gaps in services through a provision of services and strategies.

9.4. Workforce Innovation and Opportunity Act (WIOA) Employment and Training

Activities: Does the state intend to include CSBG employment and training activities as part of a WIOA Combined State Plan, as allowed under the Workforce Innovation and Opportunity Act (as required by the assurance under Section 676(b)(5) of the CSBG Act)?

☐ Yes ☐ No Yes

Note: This response will link to the corresponding CSBG assurance, Item 14.5.

9.4a. WIOA Combined Plan: If the state selected yes under Item 9.4, provide the CSBG-specific information included in the state's WIOA Combined Plan. This information includes a description of how the state and the eligible entities will coordinate the provision of employment and training activities through statewide and local WIOA workforce development systems. This information may also include examples of innovative employment and training programs and activities conducted by community action agencies or other neighborhood-based organizations as part of a community antipoverty strategy. [Narrative, 4000 characters]

In January 2020, the State Workforce Development Board presented to the Governor the 2020 Goals for the State Workforce Development Board, which include five (5) priorities to sustain and grow Tennessee's robust economy and continue to advance the mission for Tennessee to become the premier workforce system in the nation.

Through quarterly workgroups covering the following key areas will correspond and provide charters to State Workforce Development Board:

1. Fiscal & Reporting
2. Joint Monitoring & Compliance
3. Service Delivery & Integrated Workforce Strategy
4. Apprenticeship & Work -Based Learning
5. Data & Performance

Each workgroup is committed to implementing initiatives in collaboration with partners to build a skilled and educated workforce under following five (5) priorities outlined by the State Workforce Development Board:

1. Create an Integrated Intake System to Efficiently Deliver Services
 - a. Integrate Services from All Workforce Partners;
 - b. Foster and Encourage Increased Collaboration and Alignment among Workforce Partners;
 - c. Integrate the Case Management and Finance System; and
 - d. Create New Unified Programs based on the New Strategy for Integration
2. Create a Shared Vision for Supporting Tennesseans with the Greatest

Number of Barriers to Enter the Workforce

- a. Create an Integrated Communications Plan to Foster Collaboration Among Workforce Partners; and
- b. Build Capacity to Allow for Integration and Improved Service Delivery
3. Create a Trained Workforce to Meet Current Industry Needs
4. Create New Dashboards to Measure the Effectiveness of the Integrated Workforce Strategy
 - a. Improve Overall Accountability; and
 - b. Establish Shared Objectives Among Workforce Partners
5. Create a Simple and Effective Engagement Experience for All Candidates

Although CSBG is not a core partner in the WIOA Combined Plan, CSBG is a required partner for one-stop operations and programs and services. TDHS and CSBG roles in the workgroups will foster collaboration and continued alignment for the next iteration of the WIOA Combined State Plan.

TDHS will continue to facilitate coordination of programs and activities conducted by the agencies and other neighborhood-based organizations in developing employment and education training activities as needed in coordination with State and Local Workforce Development Area (LWDA) and as outlined through their CSBG Community Action Plan.

9.4b. Employment and Training Activities: If the state selected no under Item 9.4, describe the coordination of employment and training activities, as defined in Section 3 of WIOA, by the state and by eligible entities providing activities through the WIOA system. [Narrative, 4000 characters]

9.5. Emergency Energy Crisis Intervention: Describe how the State will assure, where appropriate, that emergency energy crisis intervention programs under title XXVI (relating to Low Income Home Energy Assistance Program) are conducted in each community in the State, as required by the assurance under Section 676(b)(6) of the CSBG Act). [Narrative, 4000 characters]

Note: This response will link to the corresponding CSBG assurance, Item 14.6.

TDHS has an active partnership with the Tennessee Housing Development Agency (THDA) and meets at least quarterly to collaborate regarding agency monitoring, fiscal policy, and programmatic updates to align eligibility, services, and strategies between the two entities.

9.6. Faith-based Organizations, Charitable Groups, and Community Organizations: Describe how the state will assure local eligible entities will coordinate and form partnerships with other organizations, including faith-based organizations, charitable groups, and

community organizations, according to the state's assurance under Section 676(b)(9) of the CSBG Act. [Narrative, 4000 characters]

Note: this response will link to the corresponding assurance, Item 14.9

CSBG agencies are required to identify organizations used to link services and coordinate/leverage funding to meet the needs of clients, including city and county governments, faith-based organizations, non-profits organizations, and state agencies in their CSBG Community Action Plans.

CSBG agencies are also required to list how linkages have been established or developed to fill identified gaps in services and coordinate funding with other public and private resources in the area. Agencies are to further describe existing partnerships, coalitions, and collective impact efforts their agency has established to address the needs of their community (e.g., domestic violence, homelessness, teen pregnancy prevention, transportation, task forces, and community economic development projects).

TDHS monitors these services and strategies throughout the year through monthly and annual reporting provided by the agencies.

9.7. Coordination of Eligible Entity 90 Percent Funds with Public/Private Resources:

Describe how the eligible entities will coordinate CSBG 90 percent funds with other public and private resources, according to the assurance under Section 676(b)(3)(C) of the CSBG Act. [Narrative, 4000 characters]

Note: This response will link to the corresponding assurance, Item 14.3c.

Every effort is made to coordinate all funding sources. TDHS will continue to keep CSBG agencies updated on funding opportunities and continue TDHS's partnership with TACA to provide training at the TACA Quarterly Meetings and Annual Conference to facilitate additional opportunities for funding and outreach.

Through the CSBG Contract, each agency is required to develop interagency planning, coordination, and collaboration at the agency and community level to achieve the highest level of services, strategies, coordination, collaboration, and integration of services. Before TDHS approves an agency's CSBG Community Action Plan, the agency is required to provide a narrative explaining how they partner with key stakeholders to coordinate and establish linkages through an effective delivery and coordination of CSBG services to low-income people and communities, by addressing the gaps in services, and the duplication of services.

Services and strategies are monitored throughout the year through monthly and annual reporting provided by agencies. In addition, agencies have developed local service

directories, listing links and resources, online and through brochures, and respective information and referral systems.

9.8. Coordination among Eligible Entities and State Community Action Association:

Describe state activities for supporting coordination among the eligible entities and the State Community Action Association. [Narrative, 4000 characters]

Note: This information will pre-populate the Annual Report, Module 1, Item G.5.

TACA meets quarterly and holds the TACA Annual Conference with Executive Leadership, Finance Advisors, and Outcome Advisors. Committee and task force meetings are conducted throughout the year as needed. In addition, the TACA Executive Director keeps the association apprised of training, technical assistance, and resources throughout the year.

TDHS actively partners with TACA to provide training and technical assistance in developing and implementing strategies to combat poverty in the state. Together, the two entities partner to train staff across the State in Results-Oriented Management and Accountability (ROMA), along with 6 Certified ROMA Trainers (NCRTs). The two entities meet monthly to develop T/TA Plans, provide training, exchange program updates, and seek feedback and input from the agencies.

TDHS allocates part of its administrative funds for the CSBG program to TACA to increase training and technical assistance opportunities across the state as outlined in TDHS's goals and training and technical assistance plans.

9.9. Communication with Eligible Entities and the State Community Action Association: In the table below, detail how the state intends to communicate with eligible entities, the State Community Action Association, and other partners identified under this State Plan on the topics listed below.

For any topic that is not applicable, select *Not Applicable* under Expected Frequency.

Communication Plan

Subject Matter	Expected Frequency	Format	Brief Description of "Other"
Upcoming Public and/or Legislative Hearings	Biannual	Email, Website, Public Notice	
State Plan Development	Biannual	Meetings/Presentation, Email, Website	
Organizational Standards Progress	Annually	Email, Phone Calls, Letters/Hard Copies	

Subject Matter	Expected Frequency	Format	Brief Description of "Other"
State Accountability Measures Progress	Annually	Meetings/Presentations, Email, Phone Call, Letter/hard Copies	
Tripartite Board Requirements	Annually	Meetings/Presentations, Email/Website	
CSBG Legislative/Programmatic Updates	As needed	Meetings/Presentations, Email	
State Interagency Coordination	Quarterly	Meetings/Presentation, Email	
ROMA and Performance Management	Annually	Meetings/Presentations, Email, Other	Contract; CSBG Community Action Plan
Training and Technical Assistance (T/TA) Plans	Annually	Meetings/Presentations, Email, 1:1, Phone Calls, Letters/Hard Copies	
State Monitoring Plans and Policies	Biannual	Meetings/Presentations, Email, Website, Other	CSBG Policy and Procedure Manual
Community Needs Assessments/Community Action Plans	Annually	Website, Email, Other	CSBG Community Action Plan and Application

Note: ADD-A-ROW FUNCTION – States can add rows for each additional communication topic. To add a row within this form: highlight the row and then select the plus sign (+) at the end of the row. Brief Description of "Other" allows for 250 characters.

9.10. Feedback to Eligible Entities and State Community Action Association: Describe how the state will provide information to local entities and State Community Action Associations regarding performance on State Accountability Measures. [Narrative, 4000 characters]

Note: This information is associated with State Accountability Measure 5S(iii) and will pre-populate the Annual Report, Module 1, Item G.6.

GUIDANCE: Under this question, include how the state will provide information to local entities and state associations within 60 days of receiving feedback from OCS.

Once TDHS receives feedback from the American Customer Satisfaction Index, TDHS will provide a summary of the feedback to agencies within sixty days, and develop a plan based upon the results and feedback provided. Throughout the year TDHS submits the CSBG Annual Report, National Performance Indicators (NPIs), the Performance Management and Accountability Measures, and American Customer Satisfaction Index (ACSI) Results via email to stakeholders within sixty days of completion of each item.

9.11. Communication Plan Performance Management Adjustment: Describe any adjustments the state made to the Communication Plan in this State Plan as compared

to past plans. Any adjustment should be based on the state's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail. [Narrative, 4000 characters]

Note: This information is associated with State Accountability Measures 7Sb; this response may pre-populate the state's annual report form.

TDHS provides updates during the TACA Quarterly Meetings and TACA Annual Conference. In addition, TDHS will host at least 2 webinars, meetings, and provide newsletter updates at least quarterly to actively engage agencies. CSBG will maintain a weekly Director's email and also partner with TACA to disseminate information through periodic newsletters and blogs through social media.

TDHS will conduct 2 rounds of fund utilization, grant management, and training/technical assistance calls as a form of performance management. The first round will include each agency. TDHS will additionally host a second round of calls 60 days before the new contract cycle. The second round will only include agencies that have spent approximately 80% or less of their carryforward funds.

SECTION 10: Monitoring, Corrective Action, and Fiscal Controls

Monitoring of Eligible Entities (Section 678B(a) of the CSBG Act)

- 10.1.** Specify the proposed schedule for planned monitoring visits including: full on-site reviews; on- site reviews of newly designated entities; follow-up reviews – including return visits to entities that failed to meet state goals, standards, and requirements; and other reviews as appropriate.

This is an estimated schedule to assist states in planning. States may indicate “no review” for entities the state does not plan to monitor in the performance period.

Note: This information is associated with State Accountability Measure 4Sa(i); this response pre-populates the Annual Report, Module 1, Table H.1.

GUIDANCE: Monitoring that is specific to organizational standards should be referenced within Section 6, Item 6.3a.

Monitoring Schedule – Year One

CSBG Eligible Entity	Monitoring Type	Review Type	Target Quarter	Start Date of Last Full Onsite Review	End Date of Last Full Onsite Review	Brief Description of “Other”
Anderson County	Other	Desk Review	FY1 Q2	7/10/2023	8/1/2023	Annual Desk Review of Organizational Standards
Blount County CAA	Other	Desk Review	FY1 Q2	2/1/2023	2/3/2023	Annual Desk Review of Organizational Standards
Bradley Cleveland CSA	Other	Desk Review	FY1 Q2	2/5/2023	2/8/2023	Annual Desk Review of Organizational Standards
Chattanooga	Other	Desk Review	FY1 Q2	5/8/2023	6/1/2023	Annual Desk Review of Organizational Standards
Clarksville-Montgomery County CAA	Other	Desk Review	FY1 Q2	3/22/2023	3/23/2023	Annual Desk Review of Organizational Standards
Delta HRA	Full On-Site	Onsite	FY1 Q1	2/7/2023	2/10/2023	
Douglas-Cherokee Economic Authority	Other	Desk Review	FY1 Q2	2/13/2023	2/16/2023	Annual Desk Review of Organizational Standards

CSBG Eligible Entity	Monitoring Type	Review Type	Target Quarter	Start Date of Last Full Onsite Review	End Date of Last Full Onsite Review	Brief Description of "Other"
Highland Rim Economic Corporation	Full On-Site	Onsite	FY1 Q3	3/29/2023	3/31/2023	
Knoxville Knox County Community Action Committee	Full On-Site	Onsite	FY1 Q4	3/1/2023	3/3/2023	
Metro Action Commission	Other	Desk Review	FY1 Q2	2/20/2023	2/23/2023	Annual Desk Review of Organizational Standards
Mid-Cumberland Community Action Agency	Other	Desk Review	FY1 Q2	3/22/2023	3/24/2023	Annual Desk Review of Organizational Standards
Mid-East Community Action Agency	Full On-Site	Onsite	FY1 Q3	2/15/2023	2/17/2023	
Northwest Tennessee Economic Development Council	Other	Desk Review	FY1 Q2	2/13/2023	3/13/2023	Annual Desk Review of Organizational Standards
Shelby	Other	Desk Review	FY1 Q2	3/27/2023	4/13/2023	Annual Desk Review of Organizational Standards
South Central HRA	Full On-Site	Onsite	FY1 Q4	3/8/2023	3/10/2023	
Southeast TN HRA	Other	Desk Review	FY1 Q2	2/27/2023	3/1/2023	Annual Desk Review of Organizational Standards
Southwest HRA	Other	Desk Review	FY1 Q2	5/1/2023	5/4/2023	Annual Desk Review of Organizational Standards
Upper Cumberland HRA	Full On-Site	Onsite	FY1 Q2	3/22/2023	3/24/2023	

CSBG Eligible Entity	Monitoring Type	Review Type	Target Quarter	Start Date of Last Full Onsite Review	End Date of Last Full Onsite Review	Brief Description of "Other"
Upper East TN HDA	Other	Desk Review	FY1 Q2	2/13/2023	7/3/2023	Annual Desk Review of Organizational Standards
Mt. Valley EOA	Other	Desk Review	FY1 Q2	3/6/2023	3/9/2023	Annual Desk Review of Organizational Standards

NOTE: WITHIN OLDC, the add-a-row function will not be available on this table and the first column is read-only. To add a row within this form: highlight the row and then select the plus sign (+) at the end of the row. A Brief Description of Other allows for 500 characters.

Monitoring Schedule – Year Two

CSBG Eligible Entity	Monitoring Type	Review Type	Target Quarter	Start Date of Last Full Onsite Review	End Date of Last Full Onsite Review	Brief Description of "Other"
Anderson County	Other	Desk Review	FY2 Q2	2/19/2024	2/22/2024	Annual Desk Review of Organizational Standards
Blount County CAA	Full On-Site	Onsite	FY2 Q1	11/6/2023	11/22/2023	
Bradley Cleveland CSA	Full On-Site	Onsite	FY2 Q1	10/16/2023	10/31/2023	
Chattanooga	Other	Desk Review	FY2 Q2	2/6/2024	2/9/2024	Annual Desk Review of Organizational Standards
Clarksville-Montgomery County CAA	Other	Desk Review	FY2 Q2	3/12/2024	3/15/2024	Annual Desk Review of Organizational Standards
Delta HRA	Other	Desk Review	FY2 Q2	3/25/2024	3/27/2024	Annual Desk Review of Organizational Standards
Douglas-Cherokee EA	Full On-Site	Onsite	FY2 Q4	8/12/2024	8/30/2024	
Highland Rim	Other	Desk Review	FY2 Q2	3/21/2024	3/26/2024	Annual Desk Review of Organizational Standards

CSBG Eligible Entity	Monitoring Type	Review Type	Target Quarter	Start Date of Last Full Onsite Review	End Date of Last Full Onsite Review	Brief Description of "Other"
Knoxville Knox County CAC	Other	Desk Review	FY2 Q2	2/14/2024	2/16/2024	Annual Desk Review of Organizational Standards
MAC	Full On-Site	Onsite	FY2 Q4	9/2/2024	9/20/2024	
Mid-Cumberland CAA	Other	Desk Review	FY2 Q2	3/25/2024	3/28/2024	Annual Desk Review of Organizational Standards
Mid-East CAA	Other	Desk Review	FY2 Q2	2/20/2024	2/23/2024	Annual Desk Review of Organizational Standards
Northwest Tennessee EDC	Other	Desk Review	FY2 Q2	2/28/2024	3/1/2024	Annual Desk Review of Organizational Standards
Shelby County	Other	Desk Review	FY2 Q2	3/13/2024	3/15/2024	Annual Desk Review of Organizational Standards
South Central HRA	Other	Desk Review	FY2 Q2	3/6/2024	3/8/2024	Annual Desk Review of Organizational Standards
Southeast HRA	Full On-Site	Onsite	FY2 Q3	5/6/2024	5/24/2024	
Southwest HRA	Other	Desk Review	FY2 Q2	3/11/2024	3/13/2024	Annual Desk Review of Organizational Standards
Upper Cumberland HRA	Other	Desk Review	FY2 Q2	2/19/2024	2/21/2024	Annual Desk Review of Organizational Standards
Upper East HDA	Other	Desk Review	FY2 Q2	2/1/2024	2/6/2024	Annual Desk Review of Organizational Standards
Mt. Valley EOA	Full On-Site	Onsite	FY2 Q1	10/17/2022	7/28/2023	

NOTE: WITHIN OLDC, the add-a-row function will not be available on this table and the first column is read-only. To add a row within this form: highlight the row and then select the plus sign (+) at the end of the row. A Brief Description of Other allows for 500 characters.

GUIDANCE: Comprehensive monitoring includes a review of program, administrative, fiscal and organizational standards.

If you are monitoring an entity as a follow up to an issue with another program, this can be listed under “Other.”

When providing the date of your last full onsite review – this could be for any type of review that took place **onsite**. No dates for desk reviews should be provided here.

10.2. Monitoring Policies: Provide a copy of state monitoring policies and procedures by attaching and/or providing a hyperlink. [\[Attach a document or add a link\]](#)

[See attached document.](#)

10.3. Initial Monitoring Reports: According to the state’s procedures, by how many calendar days must the state disseminate initial monitoring reports to local entities?

[\[Insert a number from 1 – 100\]](#)

45

Note: This item is associated with State Accountability Measure 4Sa(ii) and may pre-populate the state’s annual report form.

Corrective Action, Termination and Reduction of Funding and Assurance Requirements (Section 678C of the Act)

10.4. Closing Findings: Are state procedures for addressing eligible entity findings/deficiencies and the documenting closure of findings included in the state monitoring policies attached under 10.2? ☐ Yes ☐ No No

10.4a. Closing Findings Procedures: If no, describe state procedures for addressing eligible entity findings/deficiencies and the documenting closure of findings.

[\[Narrative, 2500 characters\]](#)

[Once the agency submits a corrective action plan, the corrective action plan is accepted, and TDHS is able to verify that the findings have been alleviated, TDHS will close the findings. If the agency is unable to resolve the findings through their Corrective Action Plan, the agency will receive training and technical assistance through either a Training Assistance Plan \(TAP\) or Quality Improvement Plan \(QIP\).](#)

10.5. Quality Improvement Plans (QIPs): Provide the number of eligible entities currently on QIPs, if applicable. [\[Numeric Response, 0 – 100\]](#) 0

Note: The QIP information is associated with State Accountability Measures 4Sc.

10.6. Reporting of QIPs: Describe the state’s process for reporting eligible entities on QIPs to the Office of Community Services within 30 calendar days of the state approving a QIP?

[\[Narrative, 4000 characters\]](#)

Note: This item is associated with State Accountability Measure 4Sa(iii)).

During the assessment process, if TDHS finds an agency is not meeting performance goals, administrative standards, financial management requirements, and other requirements to ensure an appropriate level of accountability, there are several, escalating courses of action.

If Agencies are unable to alleviate the findings through a Corrective Action Plan (CAP) then a Training Assistance Plan (TAP) may be required. If the number of findings warrants a Quality Improvement Plan (QIP), TDHS may initiate action in accordance with section 678C of the CSBG Act (42 U.S.C. § 9915), to establish clear timelines and benchmarks and will notify the Office of Community Services within thirty (30) calendar days of placing an agency on a Quality Improvement Plan. Continued failure of an agency to meet the standards may result in de-designation.

At any point, TDHS may determine whether it is necessary to take additional actions, including the reduction of funding, or termination of funding in accordance with CSBG IM 116 (Corrective Action, Termination, or Reduction of Funding), issued May 1, 2012.

- 10.7. Assurance on Funding Reduction or Termination:** The state assures that “any eligible entity that received CSBG funding the previous fiscal year will not have its funding terminated or reduced below the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the state determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in Section 678C(b)” per Section 676(b)(8) of the CSBG Act. ☐ Yes ☐ No Yes

Note: This response will link with the corresponding assurance under item 14.8.

Policies on Eligible Entity Designation, De-designation, and Re-designation

- 10.8. Eligible Entity Designation:** Does the state CSBG statute and/or regulations provide for the designation of new eligible entities? ☐ Yes ☐ No No

10.8a. New Designation Citation: If yes, provide the citation(s) of the law and/or regulation. [Narrative, 2500 Characters]

10.8b. New Designation Procedures: If no, describe state procedures for the designation of new eligible entities and how the procedures were made available to eligible entities and the public. [Narrative, 4000 characters]

Section 676A of the CSBG Act outlines procedures for designation and re-designation of eligible entities in un-served areas. In accordance with the CSBG Act, a state may solicit applications and designate as an eligible entity either:

- A private nonprofit organization that is geographically located in the un-served area that is capable of providing a broad range of services designed to

eliminate poverty and foster self-sufficiency and meets the requirements of the CSBG Act; or

- A private nonprofit eligible entity that is geographically located in an area contiguous to or within reasonable proximity of the un-served area and is already providing related services in the un-served area.

TDHS will grant the designation to an organization of demonstrated effectiveness in meeting the goals of the CSBG Act and may give priority to an eligible entity in a contiguous area that is already providing related services in the un-served area. If no private, nonprofit organization is identified or determined to be qualified as an eligible entity to serve the area, TDHS may designate an appropriate political subdivision of the State to serve as an eligible entity for the area.

Any nonprofit or public agency receiving CSBG funds must meet the tripartite board requirements specified in Section 676B of the CSBG Act. The process of soliciting applications to select a new eligible entity may take place during the period in which the Department of Health and Human Services is reviewing a State decision to terminate an organization's eligibility for CSBG funds.

10.9. Eligible Entity Termination: Does the state CSBG statute and/or regulations provide for termination of eligible entities? ☐ Yes ☐ No No

10.9a. Termination Citation: If yes, provide the citation(s) of the law and/or regulation. [Narrative, 2500 characters]

10.9b. Termination Procedures: If no, describe state procedures for termination of new eligible entities and how the procedures were made available to eligible entities and the public. [Narrative, 4000 characters]

As outlined in CSBG IM 116 (Corrective Action, Termination, or Reduction of Funding), issued May 1, 2012, TDHS will communicate the specific deficiency (ies) to the agency, and request that the agency correct the deficiency (ies) (i.e., findings). The findings will be communicated through management letters. TDHS will offer training and technical assistance, if appropriate, to help an agency correct the identified deficiencies or findings to meet state requirements.

Agencies may opt to correct the findings without additional training and technical assistance from the state. Agencies that require training and technical assistance will either be placed on a Training Assistance Plan (TAP) or Quality Improvement Plan (QIP) depending on the seriousness of the deficiency and the time reasonably required to correct the deficiency.

If TDHS determines that training and technical assistance are not appropriate, TDHS will prepare a report to the Secretary of the U.S. Department of Health and Human Services stating the reasons that technical assistance is not appropriate. Some examples of situations in which a State may determine that technical assistance is not appropriate may include, but are not limited, to the following:

- A deficiency for which the eligible entity has the expertise and skills available within the organization to make corrective actions without assistance;
- A deficiency for which the State has previously provided technical assistance and the eligible entity has failed to institute corrective actions;
- Multiple, widespread, and/or repeated deficiencies that cannot feasibly be addressed through technical assistance;
- A deficiency that involves evidence of fraudulent reporting or use of funds, or other evidence of criminal wrongdoing.

As outlined in Section 678C(a)(5) of the CSBG Act, the TDHS will provide adequate notice and opportunity for a hearing prior to terminating organizational eligibility for CSBG funding or otherwise reducing the proportional share of funding to an entity for cause. After providing an opportunity for a hearing, if the state finds cause for termination or reduction in funding, TDHS may initiate proceedings to terminate the designation of or reduce the funding to an agency unless the entity corrects the deficiency. If TDHS determines that funding will be reduced or that eligibility for CSBG funds will be terminated, TDHS will notify both the agency and the Office of Community Services of the decision.

A Federal review of the state decision to reduce or terminate funding may be initiated through a request from the affected organization. In accordance with 45 CFR §96.92, an eligible entity has 30 days following notification by the state of its final decision to request a review by the Secretary of the Department of Health and Human Services.

10.10. Eligible Entity Re-Designation: Do the state CSBG statute and/or regulations provide for re-designation of an existing eligible entity? ☐ Yes ☐ No ☐ No

10.10a. Re-Designation Citation: If yes, provide the citation(s) of the law and/or regulation. [Narrative, 2500 Characters]

10.10b. Re-Designation Procedures: If no, describe state procedures for re-designation of existing eligible entities and how the procedures were made available to eligible entities and the public. [Narrative, 4000 characters]

The process for re-designation would be the same as Item 108b, Designation of eligible entities. In accordance with CSBG IM 116 (Corrective Action, Termination, or Reduction of Funding), issued May 1, 2012, in the event that TDHS terminates the designation of an organization as an eligible entity, or otherwise reduces funds, any resulting funding may be awarded only to an organization that is an eligible entity for CSBG funds. Section 676A of the CSBG Act outlines procedures for designation and re-designation of eligible entities in un-served areas. In accordance with the CSBG Act, a State may solicit applications and designate as an eligible entity either:

- A private nonprofit organization that is geographically located in the un-served area that is capable of providing a broad range of services designed to eliminate poverty and foster self-sufficiency and meets the requirements of the CSBG Act; or
- A private nonprofit eligible entity that is geographically located in an area contiguous to or within reasonable proximity of the un-served area and is already providing related services in the un-served area.

TDHS will grant the designation to an organization of demonstrated effectiveness in meeting the goals of the CSBG Act and may give priority to an eligible entity in a contiguous area that is already providing related services in the un-served area. If no private, nonprofit organization is identified or determined to be qualified as an eligible entity to serve the area, TDHS may designate an appropriate political subdivision of the State to serve as an eligible entity for the area.

Any nonprofit or public agency receiving CSBG funds must meet the tripartite board requirements specified in Section 676B of the CSBG Act. The process of soliciting applications to select a new eligible entity may take place during the period in which the Department of Health and Human Services is reviewing a State decision to terminate an organization's eligibility for CSBG funds.

GUIDANCE: Re-designation implies that an entity that is already designated/receiving funds is now performing the duties and receiving funds that were previously designated to another entity, in addition to the funding that they are already receiving. This is different from a merger as an entity is not absorbing another entity. This re-designation may be permanent (**requires a formula redistribution**) or temporary while the state has officially designated a new entity and has completed a formula

redistribution. See CSBG Act 676A, *Designation and Redesignation...*, for more information.

Fiscal Controls and Audits and Cooperation Assurance

- 10.11. Fiscal Controls and Accounting:** Describe how the state's fiscal controls and accounting procedures will a) permit preparation of the SF-425 Federal fiscal reports (FFR) and b) permit the tracing of expenditures adequate to ensure funds have been used appropriately under the block grant, as required by Block Grant regulations applicable to CSBG at 45 CFR 96.30(a). [Narrative, 4000 characters]

The SF-425 report is based on data from Edison, the statewide fiscal reporting system for suppliers and employees, and the GL63f query of expenditures by account covering the period of October through the following September each year. It includes all expenditures to the CSBG grants both indirect and direct for all departmental areas.

All expenditures will have a grant-specific project, which in this case is CSBG. The chart field, which is the data field containing accounting information, explains the nature of the transaction for internal and external reporting. Payments to sub-recipients have a required set up of backup documents that detail how the agency spent funds.

To ensure proper use of the funds, TDHS monitors agencies through onsite monitoring and reviews the specific expenses to determine whether agencies have used funds properly. The state's Department of Finance & Administration, which handles TDHS fiscal functions, also has a draw ledger of Federal funds to record the state's reimbursement of the direct and indirect expenditures incurred in the administration of the CSBG program.

- 10.12. Single Audit Management Decisions:** Describe state procedures for issuing management decisions for eligible entity single audits, as required by Block Grant regulations applicable to CSBG at 45 CFR 75.521. [Narrative, 4000 characters]

Note: This information is associated with State Accountability Measure 4Sd.

Pursuant to standard language in all State of Tennessee CSBG agency contracts, non-federal entities that expend \$750,000 or more in federal funds in the entity's fiscal year are required to arrange for a single organization-wide audit conducted in accordance with federal regulations and provide the results of that audit to the State. Upon receipt of the single audit, State CSBG staff evaluate the report to determine whether there are any findings. If there are no findings, the State responds in writing to the agency notifying the agency that no corrective action is needed. If there are findings, State CSBG staff determine whether the findings rise to the level of requiring a Corrective Action Plan (CAP), or whether the findings are minor in nature and can be remediated through technical assistance or have already been remediated by the agency. If a CAP is needed, the State will issue a request in writing for the agency's CAP. The agency must respond in writing with their CAP, including supplemental documentation if needed,

within 30 days from the date of the States request. Upon receipt of the CAP, the State makes a determination to approve or deny the CAP. If approved, the State provides notice of approval in writing. If the CAP is denied, the State provides notice of denial in writing, including specific areas that must be addressed. The State's Office of Inspector General, Audit Services also conducts routine on-site reviews at agencies. During these visits for agencies that require a single audit, audit services staff review all findings from the most recent single audit report, including minor findings for which no CAP was issued, to confirm that these findings have been remediated. If the agency participates in other federal programs, such as the Social Services Block Grant or the Food Program, and their single audit includes findings across multiple programs, the State coordinates its review, response, and on-site monitoring across all program findings.

- 10.13. Assurance on Federal Investigations:** The state will "permit and cooperate with Federal investigations undertaken in accordance with Section 678D" of the CSBG Act, as required by the assurance under Section 676(b)(7) of the CSBG Act.

☒ Yes ☐ No

Yes

Note: This response will link with the corresponding assurance, Item 14.7

- 10.13a. Federal Investigations Policies:** Are state procedures for permitting and cooperating with federal investigations included in the state monitoring policies attached under 10.2?

☒ Yes ☐ No

Yes

- 10.14. Monitoring Procedures Performance Management Adjustment:** Describe any adjustments the state made to monitoring procedures in this State Plan as compared to past plans? Any adjustment should be based on the state's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail. [\[Narrative, 2500 Characters\]](#)

Note: This item is associated with State Accountability Measure 4Sb and may pre-populate the state's annual report form.

The Office of Inspector General (OIG) and CSBG Program Staff will meet annually to discuss and coordinate possible adjustments needed to the monitoring process. OIG and CSBG Program Staff will engage throughout the year on monitoring requirements, needed documentation, and updates on CSBG agencies monitoring schedule. Both OIG and CSBG Program Staff will utilize the Center of Excellence's Organizational Standards agency self-assessment and State Office Assessment to ensure that all agencies have appropriate organizational capacity, in both critical financial and administrative areas, as well as areas of unique importance to the mission of the Community Action network.

SECTION 11: Eligible Entity Tripartite Board

11.1. Tripartite Board Verification: Verify which of the following measures are taken to ensure that the state verifies CSBG eligible entities are meeting Tripartite Board requirements under Section 676B(a)(2) of the CSBG Act. [\[Check all that applies and narrative where applicable\]](#)

- ☒ Attend Board meetings
- ☒ Organizational Standards Assessment
- ☒ Monitoring
- ☒ Review copies of Board meeting minutes
- ☒ Track Board vacancies/composition
- ☐ Other [\[Narrative, 2500 characters\]](#)

11.2. Tripartite Board Updates: Provide how often the state requires eligible entities (which are not on TAPs or QIPs) to provide updates regarding their Tripartite Boards. This includes but is not limited to copies of meeting minutes, vacancy alerts, changes to bylaws, low-income member selection process, etc. [\[Select one and provide a narrative where applicable\]](#)

- ☒ Annually
- ☐ Semiannually
- ☐ Quarterly
- ☐ Monthly
- ☒ As It Occurs
- ☒ Other [\[Narrative, 2500 characters\]](#)

[Agencies are required through the CSBG Contract to advise TDHS of board vacancies within 10 days and fill vacancies within 90 days. TDHS will provide Tennessee's network of Community Services Block Grant \(CSBG\)-eligible Community Action Agencies \(CAAs\) with guidance to aid in service delivery during a time of emergency circumstances related to Tripartite Board and CSBG requirements.](#)

11.3. Tripartite Board Representation Assurance: Describe how the states will verify that eligible entities have policies and procedures by which individuals or organizations can petition for adequate representation on an eligible entity's Tripartite Board as required by the assurance under Section 676(b)(10) of the CSBG Act. [\[Narrative, 2500 Characters\]](#)

Note: This response will link with the corresponding assurance, Item 14.10.

[Before TDHS approves an agency's CSBG Community Action Plan and Application, agency staff must submit information demonstrating that their Board of Directors complies with the requirements established by the CSBG Re-Authorization Act. CSBG Program Staff and TDHS OIG Audit Services Staff further assess this requirement as part of the annual program review of each agency.](#)

11.4. Tripartite Board Alternative Representation: Does the state permit public eligible entities to use, as an alternative to a Tripartite Board, “another mechanism specified by the state to assure decision-making and participation by low-income individuals in the development, planning, implementation, and evaluation of programs” as allowed under Section 676B(b)(2) of the CSBG Act? ☐ Yes ☐ No No

11.4a. If yes, describe the mechanism used by public eligible entities as an alternative to a Tripartite Board. [Narrative, 2500 Characters]

Tennessee Code Annotated § 13-26-102 established the Human Resources Act of 1973, designating the establishment of human resource agencies, five (5) of which are community action agencies.

Tennessee Code Annotated § 13-26-103 established how each of the human resource agencies governing board and policy board are to be established. Specifically, that the membership of the policy council shall be broadly based and equitably distributed between providers and consumers of the human resource services and/or established by public law.

SECTION 12: Individual and Community Income Eligibility Requirements

12.1. Required Income Eligibility: Provide the income eligibility threshold for services in the state. [Select one item below and numeric response where applicable.]

- ☒ 125% of the HHS poverty line
- ☐ X % of the HHS poverty line (fill in the threshold): Click or tap here to enter text.%
[Numeric response]
- ☐ Varies by eligible entity [Narrative, 4000 characters]

GUIDANCE: Under *Varies by eligible entity*, provide the threshold and the reason that it varies by entity.

12.1a. Describe any state policy and/or procedures for income eligibility, such as treatment of income and family/household composition. [Narrative, 4000 characters]

To be eligible for CSBG services or benefits, clients must be at or below the federal poverty line as determined by the federal Office of Management and Budget (OMB) based on the most recent federal Census data and as revised annually (or more frequently) by U.S. Department of Health and Human Services' Poverty Guidelines. Income eligibility and documentation of the client's need for service must be completed in order to establish client eligibility prior to delivery of services. To determine the eligibility of an individual or family to receive service, a determination of citizenship or qualified alien, need for the service, and financial eligibility according to the CSBG Income guidelines must be established. Below are the eligibility requirements from the CSBG Policy & Procedure Manual.

- (1) The Tennessee Department of Human Services partners directly with CSBG eligible entities by assisting in the verification of client eligibility determination. This is accomplished via contractual agreements with the local eligible entities through which they are granted limited access to income verification for those individuals receiving Supplemental Nutrition Assistance Program (SNAP), Families First (TANF), or Medicaid assistance.
 - (i) To foster self-sufficiency, the primary services provided include case management and job training/education classes. Agencies have been encouraged to work with their local DHS offices when both are serving Families First (TANF) clients. In these situations, agencies have been successful developing resources not covered by the Families First program. Some agencies have hired Families First participants in the past year.

- (ii) Under the Employment Service, some agencies have created Job Development Staff positions. This staff works closely with local businesses and agencies to develop career opportunities for their client population rather than merely placing them in existing vacant positions.
- (iii) Sub-recipient agencies that provide Education, Employment, and Self-Sufficiency Services work to improve literacy skills of the low-income families in their communities.
- (iv) Under the income management service, some agencies are providing some financial counseling to their clients either directly, with volunteers, or by paying a credit counseling agency if applicable. All of the agencies have been provided information and training on the Financial Services Education Coalition (FSEC) manual title “Helping People in Your Community Understand Basic Financial Services”. Several agencies are using this material as a training resource for their clients. Several agencies have been working with the IRS to help their clients retrieve the Earned Income Tax Credit.
- (v) Under the Housing Service most agencies are completing “safety” repairs to homes that are identified during the Weatherization Program review. In this way the agencies are able to utilize much of the same staff and paperwork utilized in their companion program. Under the Income Management service, several agencies are using the CSBG funds to support the Weatherization Program.
- (vi) All twenty (20) agencies in 95 counties provide some level of Emergency Service to address basic needs. While all assist with eviction and utility shut-off notices, many assist with medical emergencies and food needs. Most of these emergency needs are handled with agency funds while networking activities provide the remainder. Several of the agencies also include a budget counseling program as a part of this service as a method to prevent further crisis situations. By screening the clients in this way, they are frequently able to identify additional client needs, develop a self-Sufficiency plan and thereby prevent another crisis.
- (vii) All agencies are required to select community-level goals based on their Needs Assessments. This determination is made at the local level.

12.2. Income Eligibility for General/Short Term Services: Describe how the state ensures eligible entities generally verify income eligibility for those services with limited intake procedures (where individual income verification is not possible or practical). An example of these services is emergency food assistance. [Narrative, 4000 characters]

With the exception of providing a free-standing information and referral service, persons receiving any CSBG service, must be within income guidelines and in need of

the requested services. Eligibility for services must be determined either by client self-declaration or by the verification method.

- a. The verification method is used for services when monetary payments or tangible benefits purchased with CSBG funds are provided. All points of eligibility (need and income) must be verified prior to the customer receiving service. The necessary verifications must be obtained within ten (10) calendar days of the application date.
- b. Customer Self Declaration is the declaration method that can be used for all services unless monetary payments or tangible benefits purchased with CSBG funds are provided. EXCEPTION: If the tangible benefit is donated goods/food, clothing, household necessities, the declaration method can be used to determine eligibility. The applicant's statement of both need and income status will be entered in the appropriate spaces on the application form.

After all avenues of documenting income eligibility are exhausted, self-declaration is allowable, but evidence of the attempts at proving eligibility must be contained in the client file, including a statement signed by the applicant indicating that the individual has no other proof of income (Zero Income).

In Zero Income scenarios, it is necessary to obtain confirmation when a household unit has zero income. A current employer separation letter is acceptable when verifying zero income (within 30 days). Any household member eighteen (18) years and older claiming zero-income must have a Self-Declaration of Zero Income Statement signed by the Head of Household. All eligible entities will use the self-declaration statement even if household members are listed in Electronic Benefit Management System (EBMS) or provide a current employer separation letter.

The statement of support is a written document that must be attached to all applications for assistance by zero income households. The statement of support must be signed by the applicant and the support person who is supplying the information. It must describe the kind of support provided and indicate the relationship between the support person and the applicant.

The support statement should verify that the supporting person(s) have not received assistance claiming zero income. Agencies may require additional documentation and verification from support person as to the ability to provide support to multiple households. Agencies that are requiring additional verification must do so consistently for all applicants without bias.

There are two different types of services provided through the Community Services Block Grant Program - intangible services and tangible services (as defined CSBG Policy & Procedure Manual). When an intangible service is provided, a certification period

must be established at the point that eligibility is determined. For tangible services, it is sufficient to establish customer eligibility and a certification period is not required.

An eligible customer may be certified for any period of time extending up to, but no longer than, six months from the date eligibility was established, unless all members of the household are on a fixed income and no other income is present. When all members of the household are on fixed income from Social Security benefits, SSI benefits, or other pensions with no other income, the certification period may extend up to 12 months from the date eligibility was established. When a household consists of both members having fixed income, and members having other types of income, the eligibility period cannot exceed six months, when an exception for crisis-oriented emergency programs, in which the certification period cannot extend beyond 60 calendar days.

The effective date of eligibility is the date the customer signs the application when the declaration method is used and the date the agency worker verifies income when the verification method is used. Eligibility must not be determined retroactively.

Services and Strategies may be provided under the following domains:

- Employment
- Education and Cognitive Development
- Income, Infrastructure, and Asset Building
- Housing
- Health and Social/Behavioral Development (included nutrition)
- Civic Engagement and Community Involvement
- Services Supporting Multiple Domains
- Linkages (e.g. partnerships that support multiple domains)
- Agency Capacity Building
- Other (e.g., emergency management/disaster relief)

A certification period must be established for intangible services. A certification period is not required for tangible benefits or service activities performed on behalf of the customer by agency staff.

12.3. Community-targeted Services: Describe how the state ensures eligible entities' services target and benefit low-income communities for those services that provide a community-wide benefit (e.g., development of community assets/facilities, building partnerships with other organizations). [Narrative, 4000 characters]

The CSBG Contract allows for agencies to provide Community Organization / Brokerage/ Advocacy within each of the designated service categories to develop and implement projects which mobilize community resources to meet the needs of low-income persons

to increase the community awareness, education, training, and to arrange for partnerships and coordinated initiatives.

DRAFT

SECTION 13: Results Oriented Management and Accountability (ROMA) System

- 13.1. Performance Measurement System:** Identify the performance measurement system that the state and all eligible entities use, as required by Section 678E(a) of the CSBG Act and the assurance under Section 676(b)(12) of the CSBG Act. [\[Select one\]](#)

Note: This response will also link to the corresponding assurance, Item 14.12. and will pre-populate the Annual Report, Module 1, Item I.1.

- ☒ The Results Oriented Management and Accountability (ROMA) System
- ☐ Another performance management system that meets the requirements of Section 678E(b) of the CSBG Act
- ☐ An alternative system for measuring performance and results

13.1a. ROMA Description: If ROMA was chosen in Item 13.1, describe the state's written policies, procedures, or guidance documents on ROMA. [\[Narrative, 4000 characters\]](#)

The CSBG Policy & Procedure Manual outlines a framework for expectations for the CSBG Performance Management Framework (as listed below). In addition, the CSBG Policy & Procedure Manual provides guidance on how ROMA should be incorporated into the Community Needs Assessment and Planning process (see below).

CSBG Performance Management System Framework

The Performance Management Framework includes: 1) Organizational standards for local CSBG eligible entities; 2) Accountability measures for states and OCS; 3) Results Oriented Management and Accountability (ROMA) Next Generation; and 4) The CSBG Annual Report, which includes an updated and refined set of CSBG outcome measures. These elements are designed to increase accountability across all three levels of the network (Federal, State and local) and to enable program administrators at all levels to make better program decisions based on data.

Ultimately, it is expected that this framework will help OCS and the CSBG Network to generate stronger results for people with low-incomes and communities served by the national network of states and eligible entities. Reference [Information Memorandum 152 - CSBG Annual Report](#)

National Goals and Theory of Change

The CSBG Performance Management Framework is based on the [National Community Action Theory of Change](#). The Theory of Change provides an overview of the core principles, performance management framework, and services and strategies

implemented and led by the network to achieve the goals of Community Action. Theory of Change provides clear connections among identified needs, populations served, outcomes that are realistic and possible, and how the services and strategies provided will do what they are supposed to do. Theory of Change describes Community Action's mission, vision and purpose, educates local or state legislators, and informs funders about the national framework.

Goal 1: Individuals and families with low incomes are stable and achieve economic security.

Goal 2: Communities where people with low incomes live are healthy and offer economic opportunity.

Goal 3: People with low incomes are engaged and active in building opportunities in communities.

Core Principles

- Build local solutions specific to local needs
- Support family stability as a foundation for economic security
- Advocate for systematic change
- Pursue positive individual, family, and community level change
- Maximize involvement of people with low incomes
- Engage local community partners and citizens in solutions
- Leverage state, federal, and community resources

Measures--ROMA: Results Oriented Management and Accountability (Results)

The Results Oriented Management and Accountability (ROMA) Performance Management Framework incorporates the [State Accountability Measures](#), [Federal Accountability Measures](#), [Organizational Standards](#), and the [CSBG Annual Report](#), of which ROMA is a component which requires eligible entities to integrate all the phases of the ROMA cycle into their agency management and administrative processes from conducting the needs assessment, doing agency wide strategic planning, implementing services and strategies, and reporting and analyzing data which is based upon the [National Community Action Network Theory of Change](#).

The ROMA system was initiated in 1994 by a task force of federal, state, and local CSBG Network officials through the Monitoring and Assessment Task

Force (MATF). Based upon principles contained in the [Government Performance and Results Act of 1993](#), ROMA provides a framework for continuous growth and improvement among local CSBG-eligible entities. In 1998, the CSBG Reauthorization Act made ROMA implementation a requirement for receiving federal CSBG funds.

An important component of ROMA is the CSBG National Performance Indicators (NPIs), which creates a common set of measures to track the CSBG Network's performance with respect to services to low-income individuals, families, and communities. ROMA employs a cycle for implementation that includes community needs assessment; use of needs assessment data to identify service strategies and projected results; implementation of strategies and services; observation and report on progress; and analysis of data according to original benchmarks. The ROMA and NPI framework provides a foundation for targeting of resources based on outcomes and effectiveness of services. For more information on core activities of the State CSBG lead agencies and CSBG-eligible entities for the implementation of ROMA, see [Information Memorandum 49 - Program Challenges, Responsibilities and Strategies](#).

As outlined in the CSBG Contract, "The Grantee shall submit, within three months (3) and fifteen (15) days of the conclusion of each year of the Term, an annual report." Failure to submit the [CSBG Annual Report](#) shall result in program reimbursements being withheld until the report has been received. The Grantee shall meet performance benchmarks, as defined by the State and related to National Performance Indicators and the Performance Management Framework. The Performance Management Framework includes: Organizational standards for local CSBG eligible entities; Accountability measures for states and the Office of Community Services; Results Oriented Management and Accountability (ROMA) Next Generation; and the CSBG Annual Report, which includes an updated and refined set of CSBG outcome measures. Failure to meet the performance goals will require the Grantee to submit a corrective action plan to be incorporated within the Operational Plan and approved by the State. Continued failure to meet subsequent performance goals may result in a reduction of funding or termination of contract."

Organizational Standards (Capacity)

[Information Memorandum \(IM\) 138](#) - State Establishment of Organizational Standards for CSBG Eligible Entities, provides guidance and describes State and Federal roles and responsibilities for the establishment of organizational standards as a component of a larger performance management and accountability system for CSBG. Consistent with the authority and responsibilities of the CSBG Act establishes for the Federal office and

States, OCS requires states to establish and report on their organizational standards for CSBG eligible entities as part of an enhanced system for accountability and performance management across the CSBG Network.

The Organizational Standards Center of Excellence (OSCOE) developed standards are organized in three thematic groups comprising nine categories and totals of 58 standards for private, nonprofit eligible entities and 50 standards for public entities.

1. Maximum Feasible Participation
 - Consumer Input and Involvement
 - Community Engagement
 - Community Assessment
2. Vision and Direction
 - Organizational Leadership
 - Board Governance
 - Strategic Planning
3. Operations and Accountability
 - Human Resource Management
 - Financial Operations and Oversight
 - Data and Analysis

All of the Organizational Standards Center of Excellence developed organizational standards work together to characterize an effective and healthy organization. Some of the standards have direct links to the CSBG Act, such as the standards on the tripartite board structure and the democratic selection process. Some standards link with U.S. Office of Management and Budget (OMB) guidance, such as the standards on audits. As a whole, the standards reflect many of the requirements of the CSBG Act, applicable Federal laws and regulations, good management practices, and the values of Community Action.

The purpose of the organizational standards is to ensure that all eligible entities have appropriate organizational capacity, not only in the critical financial and administrative areas important to all nonprofit and public human service agencies, but also in areas of unique importance for CSBG-funded eligible entities. To fulfill the promise of the standards, States must provide consistent and high-quality oversight and technical assistance related to organizational standards. In addition, based on information about organizational capacity, States must work with the eligible entities

to make informed programmatic decisions about how the agencies can best meet the needs of local low-income families and communities.

As outlined in the CSBG Contract, the Contractor shall develop and implement a compliance plan in accordance with the CSBG Organizational Standards issued by the CSBG Organizational Standards Center of Excellence, set forth in [CSBG Information Memorandum \(IM\) 138](#) – State Establishment of Organizational Standards for CSBG Eligible Entities under 678B of the CSBG Act, 42 § 9914 published January 26, 2015. Grantee will implement the Organizational Standards which are applicable, depending on whether Grantee is private, nonprofit CSBG Eligible Entity or a public CSBG Eligible Entity, as set forth in Appendices 2 and 3 of IM No. 138.

Accountability Measures (Efficiency)

In collaboration with the Community Services Block Grant (CSBG) Network, the Office of Community Services (OCS) developed State and Federal Accountability Measures to track organizational performance by State CSBG Lead Agencies and OCS. These measures are part of an enhanced framework for accountability and performance management across the CSBG Network.

The State Accountability Measures capture performance data about the critical activities and functions performed at the State level. They indicate *how efficiently and effectively* the State implements the activities described in the State plan, and *what impact* the State's efforts have on the performance of local eligible entities.

As outlined in IM 144, the [State Accountability Measures](#) address efficiency and effectiveness characteristics such as timeliness, accuracy, standards, and stakeholder satisfaction in the critical activities and functions listed below:

- Development of State plan, including involving the eligible entities
- Implementation of State plan including:
 - ☐ Distribution of funds
 - ☐ Use of remainder/discretionary funds
 - ☐ Grantee monitoring and corrective action
 - ☐ Data collection, analysis, and reporting
 - ☐ Organizational standards for eligible entities
 - ☐ State linkages and communication

The Federal Accountability Measures are tied to the critical roles and responsibilities of OCS, and, where applicable, align with the State measures. The Federal accountability measures indicate OCS's effectiveness and

efficiency as well as the impact its efforts have on improving the performance of State CSBG Offices.

Like the State measures, the Federal measures address such efficiency and effectiveness characteristics as timeliness, accuracy, standards, and stakeholder satisfaction in the following critical activities:

- State plan review and acceptance
- Distribution of funds
- Grant monitoring and corrective action
- Data collection, analysis, and reporting
- Organizational standards
- Training and technical assistance
- Communications
- Grantee satisfaction

OCS requires States to collect, and report on, State CSBG Accountability Measures through their online State plan and annual reports. Concurrently, OCS will collect and report on Federal CSBG Accountability Measures.

Community Action Plan Based on Results Oriented Planning

Prior to determining the services to be provided, each agency must engage in a Results Oriented Planning Process. This requirement will be met by submitting the agency needs assessment and community plan prior to each new agency contract period. Needs assessments and community action plans will be due on the date as described by the State for the upcoming federal fiscal year (October 1 through September 30). This process enables the agency to develop a plan for meeting the multiple needs of the target population as required by the 1994 amendments to the Community Services Block Grant. Comprehensive Needs Assessment completed every three (3) years and updated annually. The Plan must include five areas:

- a community needs assessment
- a description of the service delivery system targeted to the low-income population
- a description of how linkages are to be developed to fill gaps in services
- a description of how funding under the CSBG Act will be coordinated with other resources

- a description of the service goal(s) and national performance indicators established to determine success.

Eligible Entities will submit a comprehensive plan every three (3) years and an annual update of the community action plan in subsequent years, which will prioritize the community needs based on the entity's prior comprehensive community needs assessment. The work plan will address root causes of the identified needs, gaps in services available to address the need, existing community resources, proposed interventions, and strategies or programs to address the need. The work plan will also include the Results Oriented Management and Accountability (ROMA) national goals and performance indicators to be impacted by the interventions. Eligible entities will identify action steps for each proposed strategy, intervention, or program, identified in the work plan.

13.1b. Alternative System Description: If an alternative system was chosen in Item 13.1, describe the system the state will use for performance measurement. [Narrative, 4000 characters]

13.2. Outcome Measures: Indicate and describe the outcome measures the state will use to measure eligible entity performance in promoting self-sufficiency, family stability, and community revitalization, as required under Section 676(b)(12) of the CSBG Act. [Select one and provide a narrative, 4000 characters]

Note: This response will also link to the corresponding assurance, Item 14.12.

- ☒ CSBG National Performance Indicators (NPIs)
- ☒ NPIs and others
- ☐ Others

Annually, TDHS reviews and analyzes the data submitted through the CSBG Annual Report (CSBG AR) National Performance Indicators (NPIs). Agencies submit Monthly Outcomes as outlined by the CSBG Annual Report, as well as individual and agency outcomes in the Center of Excellence Organization CSBG Assessment Tool, which incorporates five primary domains: Employment, Education, Income, Income Management, and Housing, as well as five secondary domains: Child Care, Health, Nutrition, Transportation, and Supports. In addition, for our quarterly *Community Impact in Action* newsletter and for submission for the State Annual Report agencies submit success stories. These stories demonstrate individual, community, and agency successes.

13.3. Eligible Entity Support: Describe how the state supports the eligible entities in using ROMA or an alternative performance management system. [Narrative, 4000 characters]

Note: The activities described under Item 13.3 may include activities listed in “Section 8: Training and Technical Assistance.” If so, mention briefly, and/or cross-reference as needed. This response will also link to the corresponding assurance, Item 14.12.

TDHS will continue to revitalize its efforts to train and implement ROMA throughout the network. In cooperation with TACA, TDHS will mentor, train, and recertify Certified ROMA Trainers and Certified ROMA Implementers. TDHS partners with TACA to provide ROMA Training to all the agencies across the state. Agencies are required per the CSBG Contract, at a minimum, to train all new staff within six months of hire. Training is offered throughout the state regionally at least once a year and as needed.

Throughout the year, ROMA professionals meet through the Outcome Advisors during TACA Quarterly Meetings and the TACA Annual Conference. In addition, TDHS staff has attended several conferences—National Association for State Community Service Programs, Community Action Partnership (CAP), Community Action Partnership Legal Services, Inc. (CAPLAW), Results Oriented Management and Accountability (ROMA) In-Service Continuing Education Program (ICEP) – to receive ongoing training for Community Services State Staff and CSBG-contracted agencies.

13.4. Eligible Entity Use of Data: Describe how the state intends to validate that the eligible entities are using data to improve service delivery. [Narrative, 4000 characters]

Note: This response will also link to the corresponding assurance, Item 14.12.

At the beginning of each year, agencies are required to review and analyze their data through the CSBG Community Action Plan, the Organizational Standards, board governance, and the annual review of services and strategies provided the previous year. Agencies submit monthly outcomes as outlined by the CSBG Annual Report, as well as individual and agency outcomes incorporated into the CSBG Assessment Tool, which incorporates five primary domains: Employment, Education, Income, Income Management, and Housing, as well as five secondary domains: Child Care, Health, Nutrition, Transportation, and Supports.

In addition, for the quarterly *Community Impact in Action* newsletter and for the State Annual Report agencies submit success stories. These stories demonstrate individual, community, and agency successes.

At the end of the year, eligible entities will submit the CSBG Annual Report (CSBG AR) National Performance Indicators (NPIs) to TDHS and their local governing board.

TDHS plans to provide more training and technical assistance to help agencies with data analysis and reporting to make meaningful and decision on programs and services that connect to Community Needs Assessment, CSBG Annual Report/NPIs, and to

understand the causes and conditions of poverty, identify gaps, and set targets by working with TACA and participate in a Data Collaborative with NASCSP.

Community Action Plans and Needs Assessments

- 13.5. Community Action Plan:** Describe how the state will secure a Community Action Plan from each eligible entity, as a condition of receipt of CSBG funding by each entity, as required by Section 676(b)(11) of the CSBG Act. [Narrative, 4000 characters]

Note: This response will link to the corresponding assurance, Item 14.11.

In compliance with 676(b)(11) no agency is funded without submission of the CSBG Community Action Plan/Needs Assessment.

Community Services Block Grant (CSBG) agencies will submit a comprehensive Community Action Plan at least once every three (3) years, using the template provided by the State CSBG office, in alignment with the completion of the Community Needs Assessment. If the CSBG agency completes another Community Needs Assessment within the three (3) year period, the agency will need to submit a comprehensive Community Action Plan for the next program year.

In years in which the CSBG agency does not complete a Community Needs Assessment, the CSBG agency will be allowed to submit an abbreviated Community Action Plan – Annual Update, using the template provided by the State CSBG office.

CSBG Agencies will be encouraged to complete a new Community Needs Assessment to coincide with the implementation of this policy. CSBG agencies that opt not to complete a new Community Needs Assessment upon implementation of this policy will be required to submit a comprehensive Community Action Plan each year until the new Community Needs Assessment has been completed.

- 13.6. Community Needs Assessment:** Describe how the state will assure that each eligible entity includes a community needs assessment for the community served (which may be coordinated with community needs assessments conducted by other programs) in each entity's Community Action Plan, as required by Section 676(b)(11) of the CSBG Act. [Narrative, 4000 characters]

Note: This response will link to the corresponding assurance, Item 14.11.

In compliance with 676(b)(11), no agency is funded without submission of a Community Action Plan/Needs Assessment. As a part of their annual reporting of their Community Action Plans, TDHS requires agencies to report when their latest Community Needs Assessment was conducted, their findings, and how those findings impact their Community Action Plans.

The CSBG Needs Assessment provides current, reliable information about the population and the geographic area served by each agency. The Needs Assessment includes basic information, such as:

- Geographic location (counties served, problems/obstacles to service provision in any given county, i.e., changing communities, lack of jobs or transportation)
- Demographic information about the customers to be served (estimated number of poor and vulnerable customers, general population estimate, racial/ethnic composition, and disabled)
- Needs description of customers to be served (educational level, unemployment rate, job market, housing standards/needs, crime rate, nutritional needs, substance abuse, single-parent household, etc.)
- Other agencies serving this population (services they provide, availability in all counties, accessibility, diversity among counties) such as community partners including community-based organizations, faith-based organizations, public sector partners, law enforcement, and educational institutions;
- Data analysis (summarized information collected for decision making) such as surveys, focus groups, interviews, and/or community forums;
- An analysis of the most recent U.S. Census Bureau data showing the incidence of poverty in the contract agency's service area and how poverty affects different demographic groups in the community.

The assessment relies heavily on baseline information in agency records and on customer board, and community surveys. Public meetings, United Way assessments, and other service provider assessments are utilized.

Due to unexpected events, including disasters and declarations of emergency states, additional needs for individuals, families, and communities, TDHS has developed a process for Community Action Agencies (CAAs) to submit an amended Community Needs Assessment at any time outside of the agency's scheduled timeframe in the event a new community need(s) has been identified in order to ensure unmet needs and gaps in services are addressed.

SECTION 14: CSBG Programmatic Assurance and Information Narrative
(Section 676(b) of the CSBG Act)

14.1. Use of Funds Supporting Local Activities

CSBG Services

14.1a. 676(b)(1)(A) Describe how the state will assure “that funds made available through grant or allotment will be used –

- (A) to support activities that are designed to assist low-income families and individuals, including families and individuals receiving assistance under title IV of the Social Security Act, homeless families and individuals, migrant or seasonal farmworkers, and elderly low-income individuals and families, and a description of how such activities will enable the families and individuals--
 - (i) to remove obstacles and solve problems that block the achievement of self-sufficiency (particularly for families and individuals who are attempting to transition off a State program carried out under part A of title IV of the Social Security Act);
 - (ii) to secure and retain meaningful employment;
 - (iii) to attain an adequate education with particular attention toward improving literacy skills of the low-income families in the community, which may include family literacy initiatives;
 - (iv) to make better use of available income;
 - (v) to obtain and maintain adequate housing and a suitable living environment;
 - (vi) to obtain emergency assistance through loans, grants, or other means to meet immediate and urgent individual and family needs;
 - (vii) to achieve greater participation in the affairs of the communities involved, including the development of public and private grassroots partnerships with local law enforcement agencies, local housing authorities, private foundations, and other public and private partners to –
 - (I) document best practices based on successful grassroots intervention in urban areas, to develop methodologies for widespread replication; and
 - (II) strengthen and improve relationships with local law enforcement agencies, which may include participation in activities such as neighborhood or community policing efforts;

[Narrative, 4000 characters]

1) Funds made available through this grant or allotment will be used:

- (a) to support activities that are designed to assist low-income families and individuals, including families and individuals receiving assistance under title IV of the Social Security Act, homeless families and individuals, migrant or seasonal farmworkers, and elderly low-income individuals and families, and a description of how such activities will enable the families and individuals—

The Tennessee Department of Human Services partners directly with CSBG funded agencies by assisting in the verification of client eligibility determination. This is accomplished via contractual agreements with the local eligible entities through which they are granted limited access to income verification for those individuals receiving Supplemental Nutrition Assistance Program (SNAP), Families First (TANF), or Medicaid assistance.

- (i) to remove obstacles and solve problems that block the achievement of self-sufficiency (particularly for families and individuals who are attempting to transition off a State program carried out under part A of title IV of the Social Security Act);

To foster self-sufficiency, the primary services provided include case management and job training/education classes. Agencies have been encouraged to work with their local DHS office when both are serving Families First (TANF) clients. In these situations, agencies have been successful developing resources not covered by the Families First program. Some agencies have hired Families First participants.

- (ii) to secure and retain meaningful employment;

Under the Employment Service, some agencies have created Job Developer staff positions. The staff works with local businesses and agencies to develop career opportunities for their client population rather than merely placing them in vacant positions.

- (iii) to attain an adequate education with particular attention toward improving literacy skills of the low-income families in the community, which may include family literacy initiatives;

Sub-recipient agencies that provide Education, Employment, and Self-Sufficiency Services work to improve literacy skills in the low-income families in their communities.

- (iv) to make better use of available income;

Under the income management service, some agencies are providing financial counseling to their clients either directly, with volunteers, or by paying a credit counseling agency if applicable. All of the agencies have been provided information about the “Your Money, Your Goals” financial literacy program provided through the Consumer Financial Protection Bureau. Several agencies are using this material as a training resource for their clients. Several agencies have been working with the IRS to help their clients retrieve the Earned Income Tax Credit.

- (v) to obtain and maintain adequate housing and a suitable living environment;

Under the Housing Service most agencies are completing “safety” repairs to homes that are identified during the Weatherization Program review. In this way the agencies are able to utilize much of the same staff and paperwork utilized in their companion program. Under the Income Management service, several agencies are using CSBG funds to support the Weatherization program.

- (vi) to obtain emergency assistance through loans, grants, or other means to meet immediate and urgent individual and family needs;

All twenty (20) agencies in 95 counties provide some level of emergency service. While all assist with eviction and utility shut-off notices, many also assist with medical emergencies and food needs. Most of these emergency needs are handled with agency funds while networking activities provide the remainder. Several of the agencies also include a budget counseling program as a part of this services as a method to prevent further crisis situations. By screening the clients in this way, they are frequently able to identify additional client costs, develop a self-sufficiency plan and thereby prevent another crisis.

- (vii) to achieve greater participation in the affairs of the communities involved, including the development of public and private grassroots partnerships with local law enforcement agencies, local housing authorities, private foundations, and other public and private partners to –

- (I) document best practices based on successful grassroots intervention in urban areas, to develop methodologies for widespread replication; and
 - (II) strengthen and improve relationships with local law enforcement agencies, which may include participation in activities such as neighborhood or community policing efforts;
- All agencies are required to select Community level goals based on their Needs Assessments. This determination is made at the local level.

Needs of Youth

14.1b. 676(b)(1)(B) Describe how the state will assure “that funds made available through grant or allotment will be used –

- (B) to address the needs of youth in low-income communities through youth development programs that support the primary role of the family, give priority to the prevention of youth problems and crime, and promote increased community coordination and collaboration in meeting the needs of youth, and support development and expansion of innovative community-based youth development programs that have demonstrated success in preventing or reducing youth crime, such as--
 - (i) programs for the establishment of violence-free zones that would involve youth development and intervention models (such as models involving youth mediation, youth mentoring, life skills training, job creation, and entrepreneurship programs); and
 - (ii) after-school child care programs;

[Narrative, 4000 characters]

All agencies are required, through their CSBG Community Action Plan, to describe how they are addressing the needs of youth. Agencies select goals based on their Needs Assessments. This determination is made at the local level.

Coordination of Other Programs

14.1c. 676(b)(1)(C) Describe how the state will assure “that funds made available through grant or allotment will be used –

- (C) to make more effective use of, and to coordinate with, other programs related to the purposes of this subtitle (including State welfare reform efforts)

[Narrative, 4000 characters]

Agencies are encouraged to partner with other external partners within their communities. All agencies are required to select goals based on their Needs

Assessments. This determination is made at the local level. Local Family Assistance Staff are also encouraged to network with their local Community Action Agency.

State Use of Discretionary Funds

- 14.2. 676(b)(2)** Describe “how the State intends to use discretionary funds made available from the remainder of the grant or allotment described in section 675C(b) in accordance with this subtitle, including a description of how the State will support innovative community and neighborhood-based initiatives related to the purposes of this subtitle.”

Note: The State describes this assurance under “State Use of Funds: Remainder/Discretionary,” items 7.9 and 7.10

[No response as the state describes this assurance under 7.9 and 7.10.]

Eligible Entity Service Delivery, Coordination, and Innovation

- 14.3. 676(b)(3)** “Based on information provided by eligible entities in the State, a description of...”

Eligible Entity Service Delivery System

- 14.3a. 676(b)(3)(A)** Describe “the service delivery system, for services provided or coordinated with funds made available through grants made under 675C(a), targeted to low-income individuals and families in communities within the State;”

[Narrative, 4000 characters]

Tennessee models its services according to the format provided by the Office of Community Services and the Monitoring and Assessment Task Force. Each agency provides services and strategies as outlined through the incorporation of the CSBG Annual Report and each of the three (3) National Goals. Services are provided to individuals at 125% of poverty guidelines and are provided service in all 95 counties of the state by the designated eligible entity in their community.

Eligible Entity Linkages – Approach to Filling Service Gaps

- 14.3b. 676(b)(3)(B)** Describe “how linkages will be developed to fill identified gaps in the services, through the provision of information, referrals, case management, and followup consultations.”

Note: The state describes this assurance in the State Linkages and Communication section, item 9.3b.

[No response as the state describes this assurance under 9.3b.]

Coordination of Eligible Entity Allocation 90 Percent Funds with Public/Private Resources

- 14.3c. 676(b)(3)(C)** Describe how funds made available through grants made under 675C(a) will be coordinated with other public and private resources.”

Note: The state describes this assurance in the State Linkages and Communication section, item 9.7.

[No response as the state describes this assurance under 9.7]

Eligible Entity Innovative Community and Neighborhood Initiatives, Including Fatherhood/Parental Responsibility

- 14.3d. 676(b)(3)(D)** Describe “how the local entity will use the funds [made available under 675C(a)] to support innovative community and neighborhood-based initiatives related to the purposes of this subtitle, which may include fatherhood initiatives and other initiatives with the goal of strengthening families and encouraging parenting.”

Note: The description above is about eligible entity use of 90 percent funds to support these initiatives. States may also support these types of activities at the local level using state remainder/discretionary funds, allowable under Section 675C(b)(1)(F). In this State Plan, the state indicates funds allocated for these activities under item 7.9(f).

[Narrative, 4000 characters]

Through the application of ROMA principles and the two-generation whole family approach, agencies have been encouraged to be more innovative in their approaches to address service needs in their communities. TDHS has continued to encourage agencies to think more creatively in their service approaches.

In addition, TDHS in partnership with TACA has continued to foster the implementation of the two-generation whole family approach, through ongoing training at the TACA Annual Conference, and the 2Gen Whole Family Approach regional convenings. TDHS will foster the development and implementation initiatives through Human Capacity Community Transformation.

Eligible Entity Emergency Food and Nutrition Services

- 14.4. 676(b)(4)** Describe how the state will assure “that eligible entities in the State will provide, on an emergency basis, for the provision of such supplies and services, nutritious foods, and related services, as may be necessary to counteract conditions of starvation and malnutrition among low-income individuals.”

[Narrative, 4000 characters]

Most agencies across the state operate food pantries and emergency food and shelter services for safety net services to assist with community’s needs. Based on community needs, CSBG agencies will utilize CSBG funds to expand existing Emergency Food and Shelter funding or in cases of newly identified need will establish emergency food and nutrition services. TDHS and CSBG eligible entities will support efforts made to assist families working toward the prevention of uncontrollable circumstance and emergencies in the future.

State and Eligible Entity Coordination/linkages and Workforce Innovation and Opportunity Act Employment and Training Activities

- 14.5. 676(b)(5)** Describe how the state will assure “that the State and eligible entities in the State will coordinate, and establish linkages between, governmental and other social services programs to assure the effective delivery of such services, and [describe] how the State and the eligible entities will coordinate the provision of employment and training activities, as defined in section 3 of the Workforce Innovation and Opportunity Act, in the State and in communities with entities providing activities through statewide and local workforce development systems under such Act.”

Note: The state describes this assurance in Section 9, State Linkages and Communication, specifically under 9.1 – 9.4b.

[No response as the state describes this assurance under Section 9.1 – 9.4b]

State Coordination/Linkages and Low-income Home Energy Assistance

- 14.6. 676(b)(6)** Provide “an assurance that the State will ensure coordination between antipoverty programs in each community in the State, and ensure, where appropriate, that emergency energy crisis intervention programs under title XXVI (relating to low- income home energy assistance) are conducted in such community.”

Note: The state describes this assurance in Section 9, State Linkages and Communication section, items 9.2 and 9.5.

[No response as the state describes this assurance under 9.2 and 9.5]

Federal Investigations

- 14.7. 676(b)(7)** Provide “an assurance that the State will permit and cooperate with Federal investigations undertaken in accordance with section 678D.”

Note: The state addresses this assurance in Section 10, Fiscal Controls and Monitoring under 10.13.

[No response as the state describes this assurance under 10.13]

Funding Reduction or Termination

- 14.8. 676(b)(8)** Provide “an assurance that any eligible entity in the State that received funding in the previous fiscal year through a community services block grant made under this subtitle will not have its funding terminated under this subtitle, or reduced below the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the State determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in section 678C(b).”

Note: The state addresses this assurance in Section 10 Fiscal Controls and Monitoring under 10.7.

[No response as the state describes this assurance under 10.7]

Coordination with Faith-based Organizations, Charitable Groups, Community Organizations

- 14.9. 676(b)(9)** Describe how the state will assure “that the State and eligible entities in the State will, to the maximum extent possible, coordinate programs with and form partnerships with other organizations serving low-income residents of the communities and members of the groups served by the State, including religious organizations, charitable groups, and community organizations.”

Note: The state describes this assurance in Section 9 State Linkages and Communication, under 9.6.

[No response as the state describes this assurance under 9.6]

Eligible Entity Tripartite Board Representation

- 14.10. 676(b)(10)** Describe how “the State will require each eligible entity in the State to establish procedures under which a low-income individual, community organization, or religious organization, or representative of low-income individuals that considers its organization, or low-income individuals, to be inadequately represented on the board (or other mechanism) of the eligible entity to petition for adequate representation.”

Note: The state describes this assurance in Section 11 Eligible Entity Tripartite Boards, under 11.3.

[No response as the state describes this assurance under 11.3]

Eligible Entity Community Action Plans and Community Needs Assessments

- 14.11. 676(b)(11)** Provide “an assurance that the State will secure from each eligible entity in the State, as a condition to receipt of funding by the entity through a community services block grant made under this subtitle for a program, a community action plan (which shall be submitted to the Secretary, at the request of the Secretary, with the State plan) that includes a community-needs assessment for the community served, which may be coordinated with community-needs assessments conducted for other programs.”

Note: The state describes this assurance in Section 13 ROMA, under 13.5 and 13.6.

[No response as the state describes this assurance under 13.5 and 13.6]

State and Eligible Entity Performance Measurement: ROMA or Alternate system

- 14.12. 676(b)(12)** Provide “an assurance that the State and all eligible entities in the State will, not later than fiscal year 2001, participate in the Results Oriented Management and Accountability System, another performance measure system for which the Secretary facilitated development pursuant to section 678E(b), or an alternative system for measuring performance and results that meets the requirements of that section, and [describe] outcome measures to be used to measure eligible entity performance in promoting self-sufficiency, family stability, and community revitalization.”

Note: The state describes this assurance in Section 13 ROMA under 13.1 – 13.4.

[No response as the state describes this assurance under 13.1 – 13.4]

Validation for CSBG Eligible Entity Programmatic Narrative Sections

- 14.13. 676(b)(13)** Provide “information describing how the State will carry out the assurances described in this section.”

Note: The state provides information for each of the assurances directly in section 14 or in corresponding items throughout the State Plan, which are included as hyperlinks in section 14.

[\[No response for this item\]](#)

- ☒ By checking this box, the state CSBG authorized official is certifying the assurances set out above.

DRAFT

SECTION 15: Federal Certifications

The box after each certification must be checked by the State CSBG authorized official.

15.1. Lobbying

Certification for Contracts, Grants, Loans, and Cooperative Agreements

The undersigned certifies, to the best of his or her knowledge and belief, that:

- (1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.
- (2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.
- (3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

- ☒ By checking this box, the state CSBG authorized official is providing the certification set out above.

15.2. Drug-Free Workplace Requirements

This certification is required by the regulations implementing the Drug-Free Workplace Act of 1988: 45 CFR Part 76, Subpart, F. Sections 76.630(c) and (d)(2) and 76.645 (a)(1) and (b) provide that a Federal agency may designate a central receipt point for STATE-WIDE AND STATE AGENCY-WIDE certifications, and for notification of criminal drug convictions. For the Department of Health and Human Services, the central point is: Division of Grants Management and Oversight, Office of Management and Acquisition, Department of Health and Human Services, Room 517-D, 200 Independence Avenue, SW Washington, DC 20201.

Certification Regarding Drug-Free Workplace Requirements (Instructions for Certification)

- (1) By signing and/or submitting this application or grant agreement, the grantee is providing the certification set out below.
- (2) The certification set out below is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, the agency, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.
- (3) For grantees other than individuals, Alternate I applies.
- (4) For grantees who are individuals, Alternate II applies.
- (5) Workplaces under grants, for grantees other than individuals, need to be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.
- (6) Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio studios).
- (7) If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph five).
- (8) Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules:

Controlled substance means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15);

Conviction means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes;

Criminal drug statute means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance;

Employee means the employee of a grantee directly engaged in the performance of work under a grant, including: (i) All direct charge employees; (ii) All indirect charge employees unless their impact or involvement is insignificant to the performance of the grant; and, (iii) Temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).

Certification Regarding Drug-Free Workplace Requirements

Alternate I. (Grantees Other Than Individuals)

The grantee certifies that it will or will continue to provide a drug-free workplace by:

- (a) Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
- (b) Establishing an ongoing drug-free awareness program to inform employees about - -
 - (1) The dangers of drug abuse in the workplace;
 - (2) The grantee's policy of maintaining a drug-free workplace;
 - (3) Any available drug counseling, rehabilitation, and employee assistance programs; and
 - (4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
- (c) Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph (a);
- (d) Notifying the employee in the statement required by paragraph (a) that, as a condition of employment under the grant, the employee will - -
 - (1) Abide by the terms of the statement; and
 - (2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
- (e) Notifying the agency in writing, within 10 calendar days after receiving notice under paragraph (d)(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
- (f) Taking one of the following actions, within 30 calendar days of receiving notice under paragraph (d)(2), with respect to any employee who is so convicted - -
 - (1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
 - (2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;

- (g) Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (a), (b), (c), (d), (e) and (f).

The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant:

Place of Performance (Street address, city, county, state, zip code) [\[Narrative, 2500 characters\]](#)

- ☐ Check if there are workplaces on file that are not identified here. Alternate II. (Grantees Who Are Individuals)
- (a) The grantee certifies that, as a condition of the grant, he or she will not engage in the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance in conducting any activity with the grant;
- (b) If convicted of a criminal drug offense resulting from a violation occurring during the conduct of any grant activity, he or she will report the conviction, in writing, within 10 calendar days of the conviction, to every grant officer or other designee, unless the Federal agency designates a central point for the receipt of such notices. When notice is made to such a central point, it shall include the identification number(s) of each affected grant.

[55 FR 21690, 21702, May 25, 1990]

- ☒ By checking this box, the state CSBG authorized official is providing the certification set out above.

15.3. Debarment

CERTIFICATION REGARDING DEBARMENT, SUSPENSION AND OTHER RESPONSIBILITY MATTERS

Certification Regarding Debarment, Suspension, and Other Responsibility Matters — Primary Covered Transactions

Instructions for Certification

- (1) By signing and submitting this proposal, the prospective primary participant is providing the certification set out below.
- (2) The inability of a person to provide the certification required below will not necessarily result in denial of participation in this covered transaction. The prospective participant shall submit an explanation of why it cannot provide the certification set out below. The certification or explanation will be considered in connection with the department or agency's determination whether to enter into this transaction. However, failure of the prospective primary participant to furnish a certification or an explanation shall disqualify such person from participation in this transaction.
- (3) The certification in this clause is a material representation of fact upon which reliance was placed when the department or agency determined to enter into this transaction. If it is later determined that the prospective primary participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government, the department or agency may terminate this transaction for cause or default.
- (4) The prospective primary participant shall provide immediate written notice to the department or agency to which this proposal is submitted if at any time the prospective primary participant learns that its certification was erroneous when submitted or has become erroneous by reason of changed circumstances.
- (5) The terms covered transaction, debarred, suspended, ineligible, lower tier covered transaction, participant, person, primary covered transaction, principal, proposal, and voluntarily excluded, as used in this clause, have the meanings set out in the Definitions and Coverage sections of the rules implementing Executive Order 12549. You may contact the department or agency to which this proposal is being submitted for assistance in obtaining a copy of those regulations.
- (6) The prospective primary participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency entering into this transaction.
- (7) The prospective primary participant further agrees by submitting this proposal that it will include the clause titled "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusive-Lower Tier Covered Transaction," provided by the department or agency entering into this covered transaction, without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.

- (8) A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that is not proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, ineligible, or voluntarily excluded from the covered transaction, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the List of Parties Excluded from Federal Procurement and Nonprocurement Programs.
- (9) Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.
- (10) Except for transactions authorized under paragraph 6 of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, the department or agency may terminate this transaction for cause or default.

Certification Regarding Debarment, Suspension, and Other Responsibility Matters — Primary Covered Transactions

- (1) The prospective primary participant certifies to the best of its knowledge and belief, that it and its principals:
 - (a) Are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded by any Federal department or agency;
 - (b) Have not within a three-year period preceding this proposal been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, State or local) transaction or contract under a public transaction; violation of Federal or State antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;
 - (c) Are not presently indicted for or otherwise criminally or civilly charged by a governmental entity (Federal, State or local) with commission of any of the offenses enumerated in paragraph (1)(b) of this certification; and
 - (d) Have not within a three-year period preceding this application/proposal had one or more public transactions (Federal, State or local) terminated for cause or default.
- (2) Where the prospective primary participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.

Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion — Lower Tier Covered Transactions

Instructions for Certification

- (1) By signing and submitting this proposal, the prospective lower tier participant is providing the certification set out below.
- (2) The certification in this clause is a material representation of fact upon which reliance was placed when this transaction was entered into. If it is later determined that the prospective lower tier participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.
- (3) The prospective lower tier participant shall provide immediate written notice to the person to which this proposal is submitted if at any time the prospective lower tier participant learns that its certification was erroneous when submitted or had become erroneous by reason of changed circumstances.
- (4) The terms covered transaction, debarred, suspended, ineligible, lower tier covered transaction, participant, person, primary covered transaction, principal, proposal, and voluntarily excluded, as used in this clause, have the meaning set out in the Definitions and Coverage sections of rules implementing Executive Order 12549. You may contact the person to which this proposal is submitted for assistance in obtaining a copy of those regulations.
- (5) The prospective lower tier participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency with which this transaction originated.
- (6) The prospective lower tier participant further agrees by submitting this proposal that it will include this clause titled "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion-Lower Tier Covered Transaction," without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.
- (7) A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that it is not proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, ineligible, or voluntarily excluded from covered transactions, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the List of Parties Excluded from Federal Procurement and Nonprocurement Programs.
- (8) Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.

- (9) Except for transactions authorized under paragraph five of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.

Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion — Lower Tier Covered Transactions

- (1) The prospective lower tier participant certifies, by submission of this proposal, that neither it nor its principals is presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in this transaction by any Federal department or agency.
- (2) Where the prospective lower tier participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.
- ☒ By checking this box, the state CSBG authorized official is providing the certification set out above.

15.4. Environmental Tobacco Smoke

Public Law 103227, Part C Environmental Tobacco Smoke, also known as the Pro Children Act of 1994, requires that smoking not be permitted in any portion of any indoor routinely owned or leased or contracted for by an entity and used routinely or regularly for provision of health, day care, education, or library services to children under the age of 18, if the services are funded by Federal programs either directly or through State or local governments, by Federal grant, contract, loan, or loan guarantee. The law does not apply to children's services provided in private residences, facilities funded solely by Medicare or Medicaid funds, and portions of facilities used for inpatient drug or alcohol treatment. Failure to comply with the provisions of the law may result in the imposition of a civil monetary penalty of up to \$1000 per day and/or the imposition of an administrative compliance order on the responsible entity by signing and submitting this application the applicant/grantee certifies that it will comply with the requirements of the Act.

The applicant/grantee further agrees that it will require the language of this certification be included in any subawards which contain provisions for the children's services and that all subgrantees shall certify accordingly.

- ☒ By checking this box, the state CSBG authorized official is providing the certification set out above.